

**BellSouth Corporation** 

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May 6, 2002

## WRITTEN EX PARTE

Ms Marlene H. Dortch Secretary Federal Communications Commission The Portals 445 12<sup>th</sup> Street, S.W. Washington, D.C. 20554

Re: CC Docket No. 02-35

### Dear Ms Dortch:

Each week KPMG files a written report with the Florida Public Service Commission to document the status of the Florida Third-Party Test of BellSouth's OSS. Attached is the weekly report filed on May 6, 2002. On page 36 of that Report, KPMG states that it has closed Observation 178. I am filing this report with you in response to a request from the FCC staff that BellSouth provide documentation showing that KPMG has closed that Observation.

In accordance with Section 1.1206, I am filing two copies of this notice and the accompanying attachment and request that you please place them in the record of the proceeding identified above. Thank you.

Sincerely,

Kathleen B. Levitz

Attachment

CC:

Renee Crittenden

lan Dillner Daniel Shiman Susan Pié

James Davis-Smith

# Observations and Exceptions

# Florida BellSouth OSS Test Evaluation Status

**KPMG** Consulting,

Test and Domain

Date of First Call Latest activity

Observation

1

2

Relationship Management Infrastructure

26-Jul-00

21-Mar-01

Closed

BellSouth does not appear to have public documentation available for CLECs to establish connectivity for TAG, one of their preordering and ordering interfaces.

Current issue:

KPMG Consulting has escalated the issue to an exception (Exception 20). No further action is required.

Observation

PMR5

Metrics

02-Aug-00

23-Aug-00

Closed

KPMG cannot replicate the values in the "Ordering: Percent Rejected Service Requests" Service Quality Measurement report for the CLEC Aggregate (May 2000).

Current issue:

No further action is required.

Observation

3

PMR5 Metrics

16-Aug-00

23-Aug-00

Closer

KPMG cannot replicate the values in the "Ordering: Reject Interval for Non-Trunks" Service Quality Measurement report for the CLEC Aggregate (May 2000).

Current issue:

No further action is required.

Observation

PMR5

Metrics

16-Aug-00

23-Aug-00

Closed

KPMG cannot replicate the values in the "Ordering: Firm Order Confirmation Timeliness for Non-Trunks" Service Quality Measurement report for the CLEC Aggregate (May 2000).

Current issue:

### Date of First Call Latest activity

Observation

5

PMR 5 Metrics

06-Sep-00

25-Oct-00

Closed

KPMG cannot replicate the values in the "Provisioning: Average Completion Interval & Order Completion Interval Distribution" Service Quality Measurement report for the CLEC Aggregate (May 2000).

Current issue:

No further action is required.

Observation

6

PMR4

Metrics

13-Sep-00

28-Mar-01

Closed

BellSouth does not properly construct the processed data used to validate certain Ordering Service Quality Measurements (Ordering: FOC timeliness {non-trunks} and Reject interval). BellSouth systematically excludes the entire weekend when calculating reject and firm order confirmation (FOC) intervals for the non-mechanized records of the PMAP Raw Data tables, even when a service request receives a reject or a FOC during the weekend.

Current issue:

No further action is required.

**Observation** 

7

PMR 5 Metrics

20-Sep-00

14-Dec-00

Closed

KPMG cannot replicate the values in the "Provisioning: Average Completion Notice Interval" Service Quality Measurement report for the CLEC Aggregate and BellSouth Retail (May 2000).

Current issue:

No further action is required.

**Observation** 

R

9

Metrics

PMR5

27-Sep-00

18-Oct-00

Closed

KPMG cannot replicate the values in the "E911: Timeliness" Service Quality Measurement report (May 2000). KPMG also found that BellSouth documents two methods that are inconsistent for calculating the "duration" field used in E911 metrics

Current issue:

No further action is required.

Observation Closed

PMR 4 & Metrics

04-Oct-00

18-Oct-00

BellSouth does not properly construct the processed data used to validate the Provisioning: Total Service Order Cycle Time Service Quality Measurement (SQM) report for BellSouth Retail (May 2000) therefore KPMG Consulting cannot replicate the

Current issue:

### Date of First Call Latest activity

Observation

*10* 

Relationship Management Infrastructure

25-Oct-00

22-Feb-02

Closed

BellSouth does not follow its documented process of providing proper notification intervals when software interfaces are to

Current issue:

No further action is required.

Observation

11

Metrics

Metrics

01-Nov-00

21-Mar-01

Closed

KPMG Consulting cannot replicate the values in the "Ordering: Local Number Portability (LNP) – Percent Rejected Service Requests" Service Quality Measurement report for the CLEC Aggregate (May 2000). KPMG Consulting found that BellSouth's instructions are insufficient for calculating the metrics values for this SQM.

Current issue:

KPMG Consulting has escalated the issue to an exception (Exception 21)

PMR5

Observation

12

PMR5

08-Nov-00

06-Dec-00

Closed

KPMG Consulting cannot replicate the values in the "Ordering: Local Number Portability (LNP) – Reject Interval" Service Quality Measurement report for the CLEC Aggregate (May 2000). KPMG Consulting also found that BellSouth's instructions are insufficient for calculating the metrics values for this SQM.

Current issue:

KPMG Consulting has escalated the issue to an exception (Exception 10).

Observation

13

PMR3 Metrics

08-Nov-00

14-Dec-00

Closed

BellSouth does not properly notify CLECs when they initiate changes to published historical performance measurement reports and/or the raw data files associated with these reports after this information has been removed from the Performance Measurement and Analysis Platform (PMAP) web site.

Current issue:

No further action is required.

Observation

14

PMR5 Metrics

15-Nov-00

02-May-01

Closed

KPMG Consulting cannot replicate the values in the "Provisioning: Local Number Portability LNP – Percent Missed Installation Appointments" Service Quality Measurement report (May 2000).

Current issue:

# Date of First Call Latest activity

Observation

15

PMR5 Metrics

29-Nov-00

21-Mar-01

Closed

KPMG Consulting cannot replicate the values in the "Provisioning: Local Number Portability (LNP) – Disconnect Timeliness Interval & Average Disconnect Timeliness Interval" Service Quality Measurement (SQM) report for the CLEC Aggregate (May 2000). KPMG Consulting found that BellSouth's instructions are insufficient for calculating the metrics values for this

#### Current issue.

KPMG Consulting has escalated the issue to an exception (Exception 22)

PMR5

Observation

*16* 

Metrics

29-Nov-00

06-Dec-00

Closed

KPMG Consulting cannot replicate the values in the "Ordering: Local Number Portability (LNP) – Firm Order Confirmation Timeliness" Service Quality Measurement report (May 2000)

### Current issue:

KPMG Consulting has escalated the issue to an exception (Exception 11).

Observation

*17* 

PMR 5 Metrics

14-Dec-00

07-Feb-01

Closed

KPMG Consulting cannot replicate the values in the "Provisioning: Percent Missed Installation Appointments (Non-Trunks)" Service Quality Measurement report for the CLEC Aggregate (May 2000).

#### Current issue:

No further action is required.

Observation

18

PMR 5 Metrics

14-Dec-00

07-Feb-01

Closed

KPMG Consulting cannot replicate the values in the "Maintenance & Repair: Customer Trouble Report Rate" Service Quality Measurement report for the CLEC Aggregate (May 2000).

# Current issue:

No further action is required.

Observation Closed

19

PMR 5 Metrics

14-Dec-00

24-Jan-01

KPMG Consulting cannot replicate the values in the "Provisioning: Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notices" Service Quality Measurement report for the CLEC Aggregate (May 2000).

# Current issue:

## Date of First Call Latest activity

Observation

20

PMR 5 Metrics

14-Dec-00

24-Jan-01

Closed

KPMG Consulting cannot replicate the values in the "Provisioning: Mean Held Order Interval & Distribution Intervals (Non-Trunks)" Service Quality Measurement report for the CLEC Aggregate (May 2000).

### Current issue:

No further action is required.

Observation 21

PPR1

Relationship Management Infrastructure

20-Dec-00

21-Mar-01

Closed

The distribution of Carrier Notification information associated with the BellSouth Change Control Process is not adequate. Furthermore, in BellSouth's implementation of the process, significant information is not included in the Carrier Notifications.

#### Current issue:

No further action is required for this Observation. KPMG Consulting has escalated the issue to Exception 23.

Observation

*22* 

23

PMR5 Metrics

03-Jan-01

11-Apr-01

Closed

KPMG Consulting cannot replicate the values in the "Provisioning: Coordinated Customer Conversions Interval" Service Quality Measurement report for the CLEC Aggregate (September 2000).

#### Current issue:

No further action is required.

Observation

PMR5

Metrics

03-Jan-01

28-Feb-01

Closed

KPMG Consulting cannot replicate the values in the "Ordering: Reject Interval (Trunks)" Service Quality Measurement (SQM) report for the CLEC Aggregate (October 2000). KPMG Consulting found that BellSouth's instructions are insufficient for calculating the metrics values for this SQM.

#### Current issue:

No further action is required.

Observation

PMR5

24

Metrics

03-Jan-01

07-Mar-01

Closed

KPMG Consulting cannot replicate the values in the "Provisioning: Troubles Within 30 Days of Provisioning (Trunks)" Service Quality Measurement report for the CLEC Aggregate (May 2000).

### Current issue:

### Date of First Call Latest activity

Observation

25

/R5 Metrics

03-Jan-01

04-Apr-01

Closed

KPMG Consulting cannot replicate the values in the "Provisioning: Local Number Portability (LNP) – Total Service Order Cycle Time" Service Quality Measurement (SQM) report for the CLEC Aggregate (May 2000). KPMG Consulting found that BellSouth's instructions are insufficient for calculating the metrics values for this SQM.

### Current issue:

No further action is required.

Observation

**26** PPR

Relationship Management Infrastructure

17-Jan-01

21-Mar-01

Closed

BellSouth does not have public documentation available for CLECs to correlate the available version(s) of the Telecommunications Access Gateway (TAG) interface with either the BellSouth Business Rules for Local Ordering OSS 99 or the BellSouth Pre-Order Business Rules.

#### Current issue:

No further action is required on this Observation. KPMG Consulting has escalated the issue to Exception 25.

Observation

*27* 

PPR1 Relationship Management Infrastructure

17-Jan-01

21-Mar-01

Closed

BellSouth does not have a clearly defined process for addressing the expedited release of BellSouth documentation defects.

#### Current issue.

No further action is required on this Observation. KPMG Consulting has escalated the issue to Exception 26.

PMR5

Observation

28

Metrics

24-Jan-01

31-Jan-01

Closed

KPMG Consulting cannot replicate the values in the "Operator Services and Directory Assistance: Speed to Answer Performance/Percent Answered within "X" Seconds - Toll" and the "Operator Services and Directory Assistance: Speed to Answer Performance/Percent Answered within "X" Seconds - Directory Assistance (DA)" Service Quality Measurement reports for the CLEC Aggregate (May 2000).

# Current issue:

No further action is required.

Observation

29

Repair, Provisioning & Maintenance

24-Jan-01

28-Feb-01

Closed
BellSouth faile

BellSouth failed to meet the Frame Due Time on Commercial CLEC loop migrations.

#### Current issue:

TVV4

PMR5

### Date of First Call Latest activity

**Observation** Closed

30

Repair, Provisioning & Maintenance

24-Jan-01

25-Apr-01

The BellSouth UNE -Center does not always call the CLEC Network Operations Center (NOC) to verify and confirm Coordinated Conversions or calls a different telephone number than that which the CLEC designated as the Impcon on the

### Current issue:

No further action required.

Observation

31

Metrics

24-Jan-01

07-Mar-01

Closed

KPMG Consulting cannot replicate the values in the three Collocation Service Quality Measurement (SQM) reports, "Average Response Time," "Average Arrangement Time," "% of Due Dates Missed," for the CLEC Aggregate (May 2000).

#### Current issue:

No further action is required.

**Observation** 

32

PMR5

Metrics

31-Jan-01

21-Mar-01

Closed

KPMG Consulting cannot replicate the values in the "Provisioning: Troubles Within 30 Days of Provisioning (Non-Trunks)" Service Quality Measurement (SQM) report for the CLEC Aggregate (May 2000).

No further action is required for this Observation. KPMG Consulting has escalated this issue to Exception 27.

**Observation** 

33

TVV1 Order Management 07-Feb-01

21-Mar-01

The BellSouth Business Rules for Local Ordering -OSS99, Issue 9K, provides ambiguous information on conditional usage notes of the LOCACT field, a conditional field on the EU form when submitted via the Telecommunications Access Gateway

## Current issue:

No further action is required on this Observation. KPMG Consulting has escalated the issue to Exception 28.

Closed

**Observation** 34 TVV10 Billing

14-Feb-01

21-Mar-01

BellSouth improperty populates the "ToNumber" field in the related Daily Usage File (DUF) record for customer service calls (611 calls) placed from telephone numbers within the "407" area code.

No further action is required regarding this Observation. KPMG Consulting has escalated the issue to Exception 29.

### Date of First Call Latest activity

Observation

35

TVV10 Billing

14-Feb-01

21-Mar-01

Closed

BellSouth has improperly populated the "ToNumber" field in the Access Daily Usage File (ADUF) records for certain long

Current issue:

No further action is required regarding this Observation. KPMG Consulting has escalated the issue to Exception 30.

Observation

36

TVV10 Billing

14-Feb-01

21-Mar-01

Closed

BellSouth failed to deliver Daily Usage File (DUF) records for toll-free calls.

Current issue.

No further action is required regarding this Observation. KPMG Consulting has escalated the issue to Exception 31.

Observation

*37* 

TVV1

Order Management

14-Feb-01

21-Mar-01

Closed

The BellSouth Business Rules for Local Ordering —OSS '99, Issue 9K, provides information inconsistent with the system responses being generated in reference to the Carrier Identification Code field, a conditional field on the Local Service

Current issue

No further action is required regarding this Observation. KPMG Consulting has escalated the issue to Exception 32.

Observation

38

TVV4

Repair, Provisioning & Maintenance

21-Feb-01

16-May-01

Closed

BellSouth issued a Firm Order Commitment (FOC) on a xDSL/Line-Sharing order when the loop could not support xDSL

Current issue:

No further action is required.

Observation

39

TVV4 Repair, Provisioning & Maintenance

21-Feb-01

06-Jun-01

Closed

BellSouth did not provision the Central Office splitter equipment assigned to a Line-Share order on the Firm Order Commitment (FOC) date.

Current issue:

TVV4

### Date of First Call Latest activity

Observation
Closed

40

Repair, Provisioning & Maintenance

21-Feb-01

07-Mar-01

There are inconsistencies in BellSouth's process and technical documentation with regard to the allowable foreign voltage parameter established for xDSL loops.

### Current issue:

No further action is required.

Observation

41

TVV3 Order Management

21-Feb-01

21-Mar-01

Closed

BellSouth Flow -Through documentation is incomplete and inconsistent, specifically the Flow -Through Ordering Matrix, Flow-Through Parameters, and the BellSouth Service Quality Measurement Plan LSR Flow-Through Matrix.

#### Current issue:

No further action is required regarding this Observation. KPMG Consulting has escalated the issue to Exception 33.

**Observation** 

42

TVV10 Billing

28-Feb-01

18-Jul-01

Closed

BellSouth failed to deliver Daily Usage File (DUF) records for a variety of completed calls.

#### Current issue:

No further action is required.

**Observation** 

43

TVV1 Order Management

08-Mar-01

22-Aug-01

Close

KPMG Consulting is unable to complete several orders using the Electronic Data Interchange (EDI) interface.

#### Current issue.

No further action is required.

Observation Closed

44

PPR14 Repair, Provisioning & Maintenance

14-Mar-01

18-Jul-01

BellSouth does not meet the stated intervals and target objectives for maintenance on UNE Non-Designed (SL1) Loops.

### Current issue:

# Date of First Call Latest activity

Observation Closed

45

4 Repair, Provisioning & Maintenance

14-Mar-01

13-Feb-02

BellSouth returned Firm Order Commitment (FOC) Frame Due Times that do not match the regular hours for provisioning.

#### Current issue:

No further action is required.

Observation

46

TVV1 Order Management

14-Mar-01

18-Apr-01

Closed

The BellSouth Business Rules for Local Ordering –OSS '99, Issue 9K, do not accurately describe the process for submitting orders for ISDN-BRI Resale Service.

### Current issue:

No further action is required.

Observation

47

TVV1 Order Management

14-Mar-01

18-Apr-01

Closed

KPMG Consulting is unable to receive documents using the Electronic Data Interchange (EDI) interface.

### Current issue:

No further action is required.

Observation

48

TVV1 Order Management

14-Mar-01

16-Aug-01

Closed

The BellSouth Business Rules for Local Ordering OSS '99, Issue 9K, does not offer CLECs instruction on how to submit an order for the migration of a customer's Digital Signal 1 (DS1) unbundled (UNE) loop with Local Number Portability.

## Current issue:

No further action is required.

Observation

49

TVV1

Order Management

21-Mar-01

08-Aug-01

Open

BellSouth does not provide time stamps for Local Service Request (LSR) Order Clarifications and Completions via the LENS order manager software.

### Current issue:

At the direction of the Florida Public Service Commission, this Observation is currently on hold.

Date of First Call Latest activity

**Observation** 

50

TVV10 Billing

21-Mar-01

11-Apr-01

Closed

BellSouth incorrectly billed for unbundled usage for various call types.

Current issue:

No further action required.

**Observation** 

51

TVV10 Billing

21-Mar-01

11-Apr-01

Closed

BellSouth incorrectly billed for resale usage for various call types.

Current issue:

No further action is required.

Observation

52

PPR5

TVV1 Order Management

28-Mar-01

25-Jul-01

BellSouth does not provide time stamps for Local Service Request (LSR) Order Clarifications and Errors (CLR/ERR), Firm Order Confirmations (FOCs) and Completion Notices (CNs) via the RoboTAG order management software.

Current issue:

No further action is required.

**Observation** 

53

Relationship Management Infrastructure

28-Mar-01

25-Jul-01

Closed

BellSouth does not appear to have Electronic Data Interchange (EDI) interface documentation available to CLECs to describe the limitations (if any) on the size of an EDI batch transmission nor the quantity or frequency of batch transmissions that a CLEC may send to BellSouth.

Current issue:

No further action is required.

Observation Closed

54

PPR5

Relationship Management Infrastructure

28-Mar-01

25-Jul-01

BellSouth does not appear to have Telecommunications Access Gateway (TAG) documentation available to CLECs to describe limitations or design recommendations for the following TAG elements: Application IDs, Notification Servers, TAG APIs, nor does it provide any recommendations as to a appropriate relationship between these item.

Current issue:

TVV1

### Date of First Call Latest activity

**Observation** 

55

Order Management

04-Apr-01

05-Sep-01

Closed

KPMG Consulting is unable to receive responses using the Electronic Data Interchange (EDI) interface.

### Current issue:

No further action is required.

Observation

*56* 

Order Management

11-Apr-01

25-Jul-01

Closed

BellSouth had implemented business rule updates from the BellSouth Business Rules for Local Ordering - OSS99, Issue 9L prior to its release on March 30, 2001.

### Current issue:

No further action is required.

Observation

57 PMR5 Metrics

29-Aug-01

Closed

KPMG Consulting cannot replicate the values in the "Provisioning: Total Service Order Cycle Time" Service Quality Measurement (SQM) report for the CLEC Aggregate (January 2001).

### Current issue:

No further action is required.

Observation Closed

58

TVV1 Order Management 15-Aug-01

The BellSouth Business Rules for Local Ordering —OSS '99, Issue 9L, does not allow Competitive Local Exchange Carriers (CLECs) to submit a Local Service Request (LSR) manually as a SUP to an electronically submitted order.

#### Current issue:

No further action is required.

Observation

59

TVV4 Repair, Provisioning & Maintenance 27-Jun-01

BellSouth does not have a documented process to reconcile a mismatch in the CLEC Telephone Number and the BellSouth Telephone Number on coordinated conversions with Local Number Portability (LNP).

#### Current issue:

No further action is required.

Monday, May 06, 2002

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Date of First Call Latest activity

Observation

60

TVV1 Order Management

18-Apr-01

29-Aug-01

Closed

The RoboTAG interface fails to provide Miscellaneous Account Numbers (MANs) for all cities in Florida.

Current issue:

No further action is required.

Observation

*61* 

TVV8 Repair, Provisioning & Maintenance

23-May-01

Closed

BellSouth does not close trouble tickets in a timely manner when requested by a CLEC using the ECTA Interface.

Current issue:

No further action is required.

**Observation** 

*62* 

PPR14 Repair, Provisioning & Maintenance

18-Jul-01

Closed

KPMG Consulting found that with respect to the trouble reporting process, information about network outages or service-impacting conditions is not provided to CLECs as it is to retail customers.

Current issue:

No further action is required.

**Observation** Closed

63

TVV9

Repair, Provisioning & Maintenance

02-May-01

18-Jul-01

KPMG Consulting observed that the BellSouth Customer Wholesale Interconnect Network Service (CWINS) Center trouble receipt process restricts a CLEC from reporting more than three troubles on a single call.

Current issue:

No further action is required.

Observation

64

TVV1

Order Management

09-Jan-02

Closed

KPMG Consulting has not received responses to several Local Service Requests (LSRs) submitted via the Telecommunications Access Gateway (TAG) interface.

Current issue:

## Date of First Call Latest activity

Observation

65

TVV1 Order Management

05-Sep-01

Closed

KPMG Consulting has not received responses to several Local Service Requests (LSRs) using the Electronic Data Interchange (EDI) interface.

Current issue:

No further action is required.

**Observation** 

66 PPR6

Repair, Provisioning & Maintenance

18-Jul-01

Closed

BellSouth does not have a documented process to guide CLECs through completing CLEC Selective Routing Ordering Documents for Resale Flat Rate Line Class Codes.

Current issue:

No further action is required.

Observation 67

PPR 8 Order Management

16-May-01

25-Jul-01

Closed

The hours of operation for BellSouth's Retail Business Offices and the wholesale Local Carrier Service Center (LCSC) are

Current issue:

No further action is required.

Observation

68

PMR5 Metrics 12-Dec-01

Closed

KPMG Consulting cannot replicate the values for the "Ordering: Percent Flow Through Service Requests (Detail)" Service Quality Measurement (SQM) report for the CLEC Aggregate (November 2000).

Current issue:

No further action is required.

Observation

69

Metrics

14-May-01

14-Nov-01

Closed

The formulas specified in the SQM document for calculating the SQMs listed below are inconsistent with the benchmarks ordered by the Florida Public Service Commission.

Ordering: Reject Interval

Ordering: Firm Order Confirmation Timeliness

Provisioning: Coordinated Customer Conversions Interval

PMR2

Change Management: Average Delay Days for Change Management Notices
Change Management: Average Delay Days for Documentation

Current issue:

No further action is required.

Monday, May 06, 2002

Page 14 of 72

## Date of First Call Latest activity

**Observation** 

70

PMR2 Metrics

16-May-01

18-Jul-01

The implementation of the exclusions relative to service requests cancelled by the CLEC, as stated in the "Ordering: LNP-Percent Rejected Service Requests" SQM Exclusions section, may lead to misleading metric results.

Current issue:

No further action is required.

Observation

71

PPR15 Repair, Provisioning & Maintenance

05-Jul-01

Closed

BellSouth has no documented procedures for Help Desk assistance at the Customer Wholesale Interconnect Network Service (CWINS) Centers for CLECs reporting troubles using the Trouble Analysis Facilitation Interface (TAFI).

Current issue:

No further action is required.

Observation

*72* 

PMR4 Metrics

23-May-01

01-Aug-01

Closed

BellSouth's inability to capture and retain CLEC LENS data for December – March 2001 prevents KPMG Consulting from conducting the Data Integrity (PMR4) test for the "Operations Support Systems: Average Response Time and Response Interval (Pre-Ordering/Ordering)" SQM. BellSouth's SQM reports for this metric may also be suspect.

Current issue:

No further action is required.

**Observation** 

*73* 

Metrics

PMR3

23-May-01

17-Oct-01

Closed

BellSouth did not properly conduct a downstream impact analysis when transitioning between LENS systems for the "Operations Support Systems: Average Response Time and Response Interval (Pre-Ordering/Ordering).

Current issue:

No further action is required.

Observation

74

TVV1 Order Management

23-May-01

03-Oct-01

Closed

BellSouth does not provide the expected response to Address Validation Query by Telephone Number (AVQ\_TN) submitted through the Telecommunications Access Gateway (TAG).

Current issue:

Date of First Call Latest activity

Observation Closed

*75* 

PPR14 Repair, Provisioning & Maintenance

23-May-01

05-Sep-01

KPMG Consulting observed areas in the Work Management Center (WMC) process that appear to lack safeguards that would ensure that wholesale service is afforded the same considerations and priorities as retail service.

#### Current issue:

No further action is required.

Observation
Closed

*76* 

TVV4

Repair, Provisioning & Maintenance

23-May-01

25-Jul-01

The BellSouth Provisioning Line Sharing - Method and Procedure document does not instruct the Central Office technician to half tap the circuit during the provisioning conversion.

#### Current issue:

No further action is required.

Observation

77

TVV1 Order Management

23-May-01

09-Jan-02

Closed

BellSouth does not provide sequential telephone numbers as requested using the Telephone Number Availability Query

#### Current issue:

No further action is required.

Observation

*78* 

TVV9

Repair, Provisioning & Maintenance

23-May-01

18-Jul-01

Closed

KPMG Consulting observed that the BellSouth Customer Wholesale Interconnect Network Service (CWINS) Center does not always provide CLECs with an appointment or estimated time to repair (ETTR) when trouble reports are opened.

# Current issue:

No further action is required.

Observation

79

TVV1 Ord

Order Management

23-May-01

08-Aug-01

BellSouth requires Company Code for Loop Makeup Data on Working Loops Query (LMU\_WL) and Loop Makeup Data on Spare Facility Query (LMU\_SF) but does not mention the field in the Pre-Order Business Rules.

### Current issue:

No further action is required.

Monday, May 06, 2002

### Date of First Call Latest activity

Observation Closed

80

TVV11 Billing

16-Jan-02

The application of recurring and non-recurring charges associated with UNE ports denoted by the Universal Service Order Code (USOC) UEPLX, appear to be inconsistent.

#### Current issue:

No further action is required.

Observation

*81* 

TVV1 Order Management

13-Jun-01

19-Dec-01

Closed

KPMG Consulting has not received manual Firm Order Confirmations (FOC) on orders that have been assigned a Completed Status (CP) in Bellsouth's Customer Service Order Tracking System (CSOTS).

#### Current issue:

No further action is required. KPMG Consulting to escalate to exception.

Observation

*82* 

TVV4 Repair, Provisioning & Maintenance

20-Jun-01

21-Jan-02

Open

BellSouth's systems or representatives did not update Customer Service Records (CSRs) consistently following a change in the status of a customer's account.

### Current issue:

Observation 82 is linked with Exception 112. KPMG Consulting is currently planning for a retest.

Observation

83

V6 Repair, Provisioning & Maintenance

20-Jun-01

24-Oct-01

Closed

The BellSouth Electronic Communications Trouble Administration (ECTA) system failed to adhere to the Joint Implementation Agreement with regard to Front End Close Out (FECO) functionality.

### Current issue:

No further action is required.

Observation

84

TVV1 Order Management

20-Jun-01

15-Aug-01

Closed

The BellSouth Business Rules for Local Ordering - OSS'99 contains inaccurate information regarding where to fax Unbundled Network Elements (UNE) service requests.

#### Current issue:

### Date of First Call Latest activity

Observation

*85* 

Repair, Provisioning & Maintenance

20-Jun-01

18-Jul-01

The BellSouth ADSL Synchronization at Central Office Methods and Procedures", "Central Office Methods and Procedures for ADSL, and ADSL Provisioning and Testing Job Aids documents fail to instruct the Central Office technician to conduct a second Automated Number Announcement Circuit (ANAC) test of the cable and pair.

#### Current issue:

No further action is required.

Observation 86

PPR1

Relationship Management Infrastructure

05-Jul-01

13-Feb-02

Closed

The BellSouth Release Management Team does not provide all prioritized Change Requests to the BellSouth IT Team for development and implementation.

### Current issue:

No further action is required.

Observation

*87* 

TVV1 Order Management

05-Jul-01

28-Mar-02

Open

The Local Exchange Navigation System (LENS) interface does not support orders requesting to move a CLEC account outside of the end user's location (ACT T).

### Current issue:

KPMG Consulting is currently awaiting a BellSouth implementation date in order to proceed with testing of the issues identified in this observation. Also, reviewing the BellSouth 2nd Amended Response received on 3/28/02.

PMR3

Observation

88

Metrics

05-Jul-01

22-Aug-01

Closed

KPMG Consulting has discovered that BellSouth has no documentation that describes the process of notifying outside parties of metrics changes.

#### Current issue:

No further action is required.

Observation Closed

89

V1 Order Management

05-Jul-01

03-Oct-01

The BellSouth Pre-Order Business Rules does not clearly and consistently define the values for completing the Address Validation Query (AVQ) submitted via the Telecommunications Access Gateway (TAG).

#### Current issue:

### Date of First Call Latest activity

Observation

90

Order Management

11-Jul-01

14-Nov-01

Closed

BellSouth's Pre-Order Business Rules for Loop Makeup Data on Working Loops Query (LMU\_WL) conflicts with the Telecommunications Access Gateway (TAG) API Reference Guide on Circuit ID (CKT-ID) and Telephone number (TN) field

Current issue:

No further action is required.

Observation

91

TVV1 Order Management

18-Jul-01

30-Jan-02

Closed

BellSouth provides inaccurate and inconstant date and time stamps on their responses to Local Service Requests (LSRs) submitted via RoboTAG.

Current issue:

No further action required.

Observation

92

TVV1

Order Management

18-Jul-01

30-Jan-02

Closed

KPMG Consulting has not received Firm Order Confirmations (FOCs) from the Local Carrier Service Center (LCSC) after faxing supplemental Local Service Requests (LSRs) to cancel existing orders.

Current issue:

No further action is required.

Observation

93

TVV1

Order Management

28-Nov-01

Closed

KPMG Consulting has not received timely telephone number assignment and query (TN Assignment & Query) pre-orders responses when submitting via the Telecommunications Access Gateway.

Current issue:

No further action is required.

Observation

94

TVV3 Order Management

18-Jul-01

28-Nov-01

Closed

KPMG Consulting did not receive flow through Firm Order Confirmations (FOC) on Local Service Requests (LSR) submitted electronically via the mechanized ordering process.

Current issue:

Date of First Call Latest activity

Observation

95

TVV1 Order Management

01-Aug-01

23-Jan-02

Closed

KPMG Consulting has not received timely mechanized Unbundled Network Element Switched Combinations Firm Order Confirmations (FOCs) from BellSouth's Telecommunications Access Gateway (TAG) interface.

#### Current issue:

No further action required.

**Observation** 9

96

TVV1 Order Management

01-Aug-01

29-Aug-01

Withdrawn

KPMG Consulting has not received timely partially mechanized rejects from BellSouth's Telecommunications Access Gateway (TAG) interface.

#### Current issue:

No further action is required.

Observation

97

TVV1

Order Management

01-Aug-01

29-Aug-01

Withdrawn

KPMG Consulting has not received timely partially mechanized Firm Order Conformations (FOCs) from BellSouth's Telecommunications Access Gateway (TAG) interface.

#### Current issue:

No further action is required.

Observation

PPR6

98

Repair, Provisioning & Maintenance

08-Aug-01

26-Sep-01

Closed

BellSouth's Selective Call Routing Using Line Class Codes documentation is inconsistent and incomplete.

### Current issue:

No further action is required.

Observation Closed

99

TVV1

Order Management

08-Aug-01

05-Dec-01

BellSouth's RoboTAG information requirement for REQTYP M ACT W service requests is inconsistent with the BellSouth Business Rules for Local Ordering, OSS99.

#### Current issue:

KPMG Consulting has escalated Observation 99 to Exception status. No further action is required on behalf of the observation.

Date of First Call Latest activity

Observation 100 TVV1 Order Management 08-Aug-01 Closed

Aug-01 06-Feb-02

KPMG Consulting has not received timely Completion Notices (CNs) submitted via the Electronic Data Interchange (EDI) and Telecommunications Access Gateway (TAG).

Current issue:

No further action is required.

Observation 101 TVV1 Order Management 08-Aug-01 29-Aug-01 Closed

KPMG Consulting has not received timely mechanized Unbundled Network Elements – Loop (UNE-L) Firm Order Confirmations (FOCs) from BellSouth's Electronic Data Interchange (EDI) interface.

Current issue:

No further action is required.

Observation 102 TVV6 Repair, Provisioning & Maintenance 15-Aug-01 13-Mar-02 Closed

The BellSouth ECTA system failed to process the Mechanized Loop Test (MLT) as designed.

Current issue:

No further action is required.

**Observation 103** TVV11 Billing 15-Aug-01 15-Aug-01

Closed

BellSouth distributed CABS bills to KPMG Consulting which contained an incorrect rate.

Current issue:

No further action is required.

Observation 104 TVV1 Order Management 15-Aug-01 06-Feb-02

KPMG Consulting has experienced multiple system errors while processing Local Service Requests (LSRs) through the Local Exchange Navigation System (LENS) interface.

Current issue:

No further action required.

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# Date of First Call Latest activity

Observation 105

PMR5

Metrics

15-Aug-01

27-Feb-02

KPMG Consulting cannot replicate the values in the Provisioning: Hot Cut Conversions - % Provisioning Troubles Within 7 days of a completed Service Order Service Quality Measurement (SQM) report for the CLEC Aggregate (May 2001). KPMG Consulting found that BellSouth's instructions in the Raw Data User Manual are insufficient for calculating the metrics

No further action is required on the part of BellSouth.

Observation

106

Repair, Provisioning & Maintenance

22-Aug-01

21-Mar-02

Open

BellSouth's systems or representatives have not consistently updated the directory databases as specified in orders submitted by KPMG Consulting.

### Current issue:

KPMG Consulting is currently reviewing the BellSouth Response.

TVV4

Observation 107

TVV8

Repair, Provisioning & Maintenance

22-Aug-01

23-Jan-02

Closed

The BellSouth Electronic Bonding Trouble Administration system failed to appropriately process 'cancelTroubleReport'

#### Current issue:

No further action is requred.

Observation 108 TVV1

Order Management

22-Aug-01

13-Feb-02

Closed

BellSouth Business Rules for Local Ordering - OSS99, contains inconsistent and incomplete instructions necessary for Competitive Local Exchange Carriers (CLECs) to access and use BellSouth's systems.

### Current issue:

No further action is required.

Observation 109

PPR8

Order Management

29-Aug-01

19-Dec-01

Closed The service-level of access objectives for BellSouth's wholesale and retail call centers are not at parity.

Current issue: No further action is required.

Date of First Call Latest activity

Observation 110 PMR5 Metrics

12-Sep-01

KPMG Consulting cannot replicate the values in the "Ordering: Acknowledgement Message Timeliness" Service Quality Measurement (SQM) report for the CLEC Aggregate (May 2001).

### Current issue:

No further action is required.

Observation 111 PPR8 Order Management Closed

05-Sep-01

11-Oct-01

BellSouth has implemented an inadequate process for CLEC interaction with the Local Carrier Service Center (LCSC) Fleming Island Call Center.

### Current issue:

No further action required.

Observation 112 PMR2 Metrics 05-Sep-01

29-Nov-01

Closed

The formula specified in the "Ordering: Acknowledgement Message Timeliness" Service Quality Measurement (SQM) document is inconsistent with the benchmark ordered by the Florida Public Service Commission.

#### Current issue:

No further activity required.

Observation 113 PMR5 Metrics 05-Sep-01

27-Feb-02

KPMG Consulting cannot replicate the values in the "Provisioning: Local Number Portability (LNP) – Total Service Order Cycle Time" Service Quality Measurement (SQM) report for the CLEC Aggregate (May 2001). KPMG Consulting found that BellSouth's instructions in the Raw Data User Manual are insufficient for calculating the metrics values for this SQM.

# Current issue:

KPMG Consulting closed this observation and raised the issues identified therein to exception status (Exception 153).

Observation 114 Closed

PPR7 Order Management 05-Sep-01

16-Jan-02

The performance evaluation processes and procedures for BellSouth's Retail and Wholesale manual ordering centers are not

# Current issue:

No further action is required.

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# Date of First Call Latest activity

Observation 115 PPR2

Relationship Management Infrastructure

05-Sep-01

06-Feb-02

The BellSouth Account Team does not respond to CLEC inquiries within the documented customer contact timeframes.

#### Current issue:

No further action is required on the part of BellSouth.

Observation 116 Closed

PPR1

Relationship Management Infrastructure

05-Sep-01

27-Feb-02

BellSouth did not follow the guidelines for notification of non-system impacting changes to the BellSouth Business Rules for Local Ordering (BBR-LO) as defined in the Change Control Process.

#### Current issue:

No further action is required.

Observation 117

TVV4

Repair, Provisioning & Maintenance

12-Sep-01

28-Nov-01

KPMG Consulting has observed that BellSouth.net has access to greater information from a loop qualification report than that of a DLEC/CLEC requesting a loop qualification for the same telephone number.

### <u>Current issue:</u>

No further action required.

Observation 118 PMR3

Metrics

12-Sep-01

27-Mar-02

Closed

KPMG Consulting has discovered that BellSouth has no documented process or control group for monitoring open change requests in TeamConnection.

# <u>Current issue:</u>

No further action is required.

Observation 119

PMR5 Metrics 26-Sep-01

07-Nov-01

KPMG Consulting cannot replicate the values in the "Ordering: Acknowledgement Message Completeness" Service Quality Measurement (SQM) report for the CLEC Aggregate (May 2001).

#### Current issue:

### Date of First Call Latest activity

Observation 120

PMR2 Metrics

.

10-Oct-01

24-Oct-01

Closed

KPMG Consulting has found that the reported values for the response time intervals for the "Operations Support Systems: Average Response Time and Response Interval" SQM are reported as percentages and are inconsistent with the documented definition in the Revised Interim Performance Metrics SQM (Version 3.00).

#### Current issue:

No further action required.

Observation 121

TVV4

Repair, Provisioning & Maintenance

10-Oct-01

30-Jan-02

Closed

BellSouth's Unbundled Dark Fiber (UDF) procedure document does not reference this the requirement for a cross-office continuity test to be performed. or provide a cross-office test procedure.

#### Current issue:

No further action required.

Observation 122

TVV1

Order Management

10-Oct-01

23-Jan-02

Closed

KPMG Consulting has not received Completion Notices (CN) to several Local Service Requests (LSRs) submitted via the Telecommunications Access Gateway (TAG) interface.

#### Current issue:

No further action is required.

Observation 123

PPR5

Relationship Management Infrastructure

10-Oct-01

19-Dec-01

Closed

BellSouth does not have processes or documentation available with sufficient detail to guide a CLEC to during the upgrade from one version of an interface to a different version.

# Current issue:

No further action required.

Observation 124

PPR1

Relationship Management Infrastructure

12-Oct-01

21-Jan-02

BellSouth failed to follow the documentation defect procedures as detailed in the BellSouth Change Control Process

#### Current issue:

Held a clarification call with BellSouth and reviewed the TAG AVI versioning policy documentation. The incorrect version was posted, removed, and then the correct version was posted. KPMG Consulting requests this Observation be left open in order to further monitor the defect process. This issue will remain open until the end of transaction testing. Currently in retest.

# Date of First Call Latest activity

Observation 125

PMR5 Metrics 17-Oct-01

27-Feb-02

KPMG Consulting cannot replicate the values in the "Provisioning: Local Number Portability (LNP) - Percent Missed Installation Appointments" Service Quality Measurement (SQM) report for the CLEC Aggrégate (May 2001).

Current issue:

KPMG Consulting closed this observation and raised the issues identified in this observation to exception status (Exception 152). No further action is required.

Observation 126

Metrics

17-Oct-01

14-Nov-01

Closed

KPMG Consulting has discovered that BellSouth is not adhering to the documented metrics change control process for tracking changes in TeamConnection.

Current issue:

No further action required. The issue raised in this Observation has been escalated to an exception.

Observation 127

TVV1

PMR3

**Order Management** 

17-Oct-01

10-Jan-02

BellSouth does not provide complete Firm Order Confirmation (FOC) or Completion Notice (C N) responses for xDSL service requests submitted through the BellSouth Local Exchange Navigation System (LENS) .

BellSouth has opened feature 9748, but as of yet, there is no announced fix date.

Observation 128

TVV3

Order Management

17-Oct-01

05-Dec-01

BellSouth did not provide flow-through classification information for Digital Subscriber Line (DSL) orders submitted by KPMG Consulting.

Current issue:

No further action required.

Observation Closed

129 PMR5 Metrics 23-Oct-01

27-Feb-02

KPMG Consulting cannot replicate the values in the "Ordering: Firm Order Confirmation (FOC) Timeliness (Trunks)" Service Quality Measurement (SQM) report for the CLEC Aggregate (May 2001). KPMG Consulting found that BellSouth's reported time buckets for this SQM and the time buckets in the Revised Interim Performance Metrics SQM (Version 3.00) are

Current issue:

Date of First Call Latest activity

Observation 130 PPR7

PMR3

Order Management

23-Oct-01

13-Mar-02

Closed

BellSouth Local Carrier Service Center (LCSC) procedures for handling fax failures are not documented.

### Current issue:

No further action is required.

Observation

131

Metrics

23-Oct-01

17-Apr-02

Closed

KPMG Consulting has discovered that BellSouth posted raw data to the PMAP Web site without simultaneously posting the corresponding release of the Raw Data User's Manual (RDUM).

### Current issue:

No further action is required.

Observation 132

PPR3

Relationship Management Infrastructure

14-Nov-01

13-Mar-02

Closed

BellSouth ECS Help Desk does not maintain an accurate tracking system for Troubles reported to ECS Help Desk.

## Current issue:

No further action is required.

Observation 133 PMR2

Metrics

14-Nov-01

19-Dec-01

Closed

The definition and calculations specified in the "Maintenance & Repair: Mean Time To Notify CLEC of Network Outages" Service Quality Measurement (SQM) document are inconsistent with the benchmark ordered by the Florida Public Service

# Current issue:

No further action required.

Observation 134

PMR5

Metrics

14-Nov-01

13-Feb-02

Closed

BellSouth's failure to report values for the Provisioning: Local Number Portability (LNP) Average Disconnect Timeliness & Disconnect Timeliness Interval Distribution Service Quality Measurement (SQM) prevents KPMG Consulting from conducting the Metrics Calculations (PMR5) test. KPMG Consulting has also found that information provided on BellSouth's Performance Measurement and Analysis Platform (PMAP) web site for this SQM is contradictory.

### Current issue:

No further action is required.

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### Date of First Call Latest activity

Observation

135

TVV2 Order Management 14-Nov-01

08-Jan-02

KPMG Consulting has not received timely responses for the pre-order queries, Address Validation (AVQ), Address Validation by Telephone Number (AVQ\_TN), Customer Service Record (CSRQ), Estimate Due Date (EDD), Service Availability (SAQ) and Telephone Number Assignment (TNAQ) submitted via the Local Exchange Navigation System (LENS) Web interface.

#### Current issue:

BellSouth has passed testing for all PO types except CDD as of the 03/19/02

Peak Day test. KPMG Consulting will continue to review.

Observation 136

TVV2

PMR5

Order Management

14-Nov-01

17-Apr-02

KPMG Consulting has not received timely responses for the pre-order queries, Address Validation (AVQ), Address Validation by Telephone Number (AVQ\_TN), Customer Service Record (CSRQ), Service Availability (SAQ) and Telephone Number Assignment (TNAQ) submitted via the Robust Telecommunications Access Gateway (RoboTAG) Web interface.

No further action is required.

Observation 137

Metrics

14-Nov-01

13-Mar-02

Closed

KPMG Consulting cannot replicate the values in the "Ordering: Firm Order Confirmation (FOC) & Reject Response Completeness" Service Quality Measurement (SQM) report for the CLEC Aggregate (May 2001). KPMG Consulting found that BellSouth's instructions in the Raw Data User Manual are insufficient for calculating the metrics values for this SQM.

### Current issue:

No further action is required.

Observation 138

PMR5

Metrics

14-Nov-01

20-Feb-02

KPMG Consulting has found that the Raw Data User Manual (RDUM) instructions for "Ordering: Service Inquiry + Firm Order Confirmation (FOC) Response Time Manual" are misleading to Competitive Local Exchange Carriers (CLECs).

#### Current issue:

No further action is required.

Observation 139 Closed

PMR5

Metrics

14-Nov-01

27-Feb-02

KPMG Consulting cannot replicate the values in the "Provisioning: % Completions/Attempts without Notice or <24 Hours Notice" Service Quality Measurement (SQM) report for the CLEC Aggregate (August 2001). KPMG Consulting found that BellSouth's instructions in the Raw Data User Manual are insufficient for calculating the metrics values for this SQM.

#### Current issue:

KPMG Consulting closed this observation and escalated this issue to exception status (Exception 151). No further action is required.

### Date of First Call Latest activity

Observation 140 Closed

Relationship Management Infrastructure

09-Jan-02

BellSouth is not classifying Change Requests as defects in accordance with the BellSouth definition of a Defect.

#### Current issue:

No further action required.

Observation 141

TVV4

Repair, Provisioning & Maintenance

28-Nov-01

02-Jan-02

Closed

BellSouth's systems or representatives did not consistently provision service in a timely manner for orders submitted by KPMG Consulting.

# Current issue:

No further action required.

Observation 143

PMR5

Metrics

12-Dec-01

16-Jan-02

Closed

KPMG Consulting cannot replicate the values in the "Provisioning: Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notices" Service Quality Measurement (SQM) report for the CLEC Aggregate (August 2001). KPMG Consulting found that the PMAP raw data is insufficient for calculating the metrics values for this SQM.

#### Current issue:

No further action required.

Observation 144

PMR5

Metrics

05-Dec-01

13-Feb-02

Closed

KPMG Consulting cannot replicate the values in the "Maintenance & Repair: Percent Repeat Troubles Within 30 Days" Service Quality Measurement (SQM) report for the CLEC Aggregate (August 2001).

#### Current issue:

No further action is required. This issue is now being addressed under Exception

Observation 145 TVV1

Order Management

05-Dec-01

20-Feb-02

KPMG Consulting has experienced a system error that disables the 'Calculate Due Date' function while processing Local Service Requests (LSRs) through the Local Exchange Navigation System (LENS) interface.

### Current issue:

### Date of First Call Latest activity

Observation 146

TVV1 Order Management

05-Dec-01

17-Apr-02

KPMG Consulting has experienced a server error that disables the 'Calculate Due Date' function while processing Local Service Requests (LSRs) through RoboTAG.

Current issue:

No further action is required.

Observation 147 PPR5

Relationship Management Infrastructure

05-Dec-01

18-Jan-02

BellSouth will not provide CLECs the opportunity to test in the CLEC Application Verification Environment (CAVE) thirty days before a release enters production.

Current issue:

KPMG Consulting and BellSouth held a clarification to discuss Observation 147.

BellSouth agreed to include dates in CLEC testing documents.

Observation 148

PPR5

Relationship Management Infrastructure

05-Dec-01

06-Mar-02

**Open**BellSouth does not apply system fixes to defects to all production versions of the Operational Support System (OSS)

Current issue:

KPMG Consulting is reviewing the BellSouth Response to Amended Observation

**Observation** 

149

PMR5 Metrics 12-Dec-01

09-Jan-02

KPMG Consulting cannot replicate the values in the "Ordering: Local Number Portability (LNP) - Firm Order Confirmation (FOC) Timeliness Interval Distribution & Firm Order Confirmation Average Interval" Service Quality Measurement (SQM) report for the CLEC Aggregate (July 2001).

Current issue:

No further action required.

Observation 150

Metrics

PMR2

12-Dec-01

10-Apr-02

Closed

The benchmark specified in the "Provisioning: Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notices" SQM document is inconsistent with the Average Jeopardy Notice Interval level of disaggregation and BellSouth's

Current issue:

# Date of First Call Latest activity

Observation 151

PMR5

Metrics

12-Dec-01

13-Feb-02

KPMG Consulting cannot replicate the values in the "Maintenance & Repair: Maintenance Average Duration" Service Quality Measurement (SQM) report for the CLEC Aggregate (August 2001).

### Current issue:

No further action is required. The issue identified by Observation 151 is now being addressed in Exception 147.

Observation 152

TVV4

Repair, Provisioning & Maintenance

12-Dec-01

06-Mar-02

BellSouth failed to use the proper codes when provisioning Operator Services/ Directory Assistance.

#### Current issue:

No further action is required.

Observation 153 PPR10 Billing

19-Dec-01

13-Feb-02

Closed

BellSouth has two different target resolution intervals published for billing dispute resolutions.

### Current issue:

No further action is required.

Observation 154

PPR1

Relationship Management Infrastructure

19-Dec-01

27-Feb-02

Closed

BellSouth did not publish the Business Rules associated with Minor release 10.3 as defined in the Change Control Process, Version 2.6, September 10, 2001.

# Current issue:

KPMG Consulting closed this observation and escalated this issue to Exception

155. No further action is required.

Observation 155 TVV1 Order Management

19-Dec-01

16-Jan-02

BellSouth documentation is unclear and representatives provide inconsistent delivery of Acknowledgments (ACKs) to Local Service Requests (LSR) sent via email to the Complex Resale Support Group (CRSG).

### Current issue:

## Date of First Call Latest activity

Observation

156

TVV1

PMR5

PMR5

Order Management

19-Dec-01

19-Dec-01

KPMG Consulting has not received timely partially mechanized rejects from BellSouth's Telecommunications Access Gateway (TAG) interface.

<u>Current issue:</u>

KPMG Consulting will be withdrawing Observation 156.

**Observation** 

157

Metrics

16-Jan-02

30-Jan-02

Closed

KPMG Consulting cannot replicate the values in the Provisioning: Coordinated Customer Conversions Interval Service Quality Measurement (SQM) report for the Test Competitive Local Exchange Carrier (CLEC) (July 2001).

Current issue:

No further action is required.

Observation 158

Metrics

16-Jan-02

13-Mar-02

KPMG Consulting found that BellSouth's instructions in the Raw Data User Manual (RDUM) regarding the usage of the prod\_desc (product description) field are insufficient for calculating the metrics values.

Current issue:

No further action is required.

Observation

159

PPR14 Repair, Provisioning & Maintenance

30-Jan-02

27-Mar-02

KPMG Consulting has found that call receipt personnel within the Residence Repair Center (RRC) in Jacksonville, FL do not adhere to BellSouth procedures outlining customer requests for earlier appointments.

Current issue:

KPMG Consulting reviewing BellSouth's Response to Amended Observation 159.

Observation 160

TVV4

Repair, Provisioning & Maintenance

30-Jan-02

13-Feb-02

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Closed

BellSouth failed to properly provision Originating Line Number Screening (OLNS) service as requested by KPMG Consulting.

Current issue:

Date of First Call Latest activity

Observation 161

PMR2 Metrics 30-Jan-02

13-Mar-02

BellSouth's ability to identify and manually notify BellSouth and CLEC customers separately is inconsistent with the Parity by Design benchmark as documented in the Maintenance and Repair: Mean Time to Notify CLEC of Network Outages SQM.

Current issue:

No futher action is required.

Observation 162

TVV4

Repair, Provisioning & Maintenance

06-Feb-02

06-Mar-02

Closed

BellSouth returned Firm Order Commitment (FOC) Frame Due Times that do not match the regular hours for provisioning on Hot Cut Orders without LNP.

<u>Current issue:</u>

No further action is required.

Observation 163

TVV1 Order Management 13-Feb-02

20-Feb-02

KPMG Consulting has not received timely partially mechanized Resale Residence and Unbundled Network Elements-Loop (UNE-L) Rejects from BellSouth's Electronic Data Interchange (EDI) interface.

Current issue:

KPMG Consulting is currently reviewing the BellSouth Response to Observation

163. Due to the nature of this observation, it will remain open until the end of

Observation 164

Order Management

TVV1

20-Feb-02

20-Feb-02

BellSouth ordering documents do not provide adequate instructions on how to submit an order for Centrex® service.

KPMG Consulting is currently awaiting a clarification response from BellSouth.

Observation 165 Closed

PPR2

Relationship Management Infrastructure

20-Feb-02

10-Apr-02

BellSouth's Account Team/CLEC Care Team Procedures documentation is unclear.

<u>Current issue:</u>

## Date of First Call Latest activity

Observation 166 PPR2 Relationship Management Infrastructure 27-Feb-02 01-Mar-02

BellSouth's Users Guides have inaccurate Account Team references.

#### Current issue:

KPMG Consulting is currently awaiting BellSouth documentation for review.

Observation167TVV3Order Management27-Feb-0218-Mar-02Open

BellSouth's flow -through documentation contains incomplete and inconsistent information regarding product flow -through capabilities of the BellSouth Operations Support Systems (OSS).

### Current issue:

KPMG Consulting is currently reviewing the BellSouth Response to this

Observation 168 PMR5 Metrics 06-Mar-02 27-Mar-02

KPMG Consulting cannot replicate the values in the Provisioning: Percent Missed Installation Appointments Service Quality Measurement (SQM) report for the Test CLEC (July 2001).

#### Current issue:

No further action is required.

Observation 169 TVV1 Order Management 06-Mar-02 10-Apr-02

KPMG Consulting has not received timely Completion Notices (CNs) submitted via the Electronic Data Interchange (EDI) and Telecommunications Access Gateway (TAG).

### Current issue:

No further action is required.

Observation 170 PPR2 Relationship Management Infrastructure 13-Mar-02 29-Apr-02

BellSouth's External Response Team (ERT) Account Management sub-process for responding to written CLEC correspondence is not documented.

#### Current issue:

KPMG Consulting is currently awaiting the BellSouth Response to this amended observation.

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Date of First Call Latest activity

Observation 171

TVV1 Order Management

13-Mar-02

27-Mar-02

Closed

BellSouth's Local Carrier Service Center (LCSC) did not provide responses to manually submitted Local Service Requests Current issue:

No further action is required.

**Observation** 

172

TVV1 Order Management 13-Mar-02

13-Mar-02

Open

BellSouth is providing an error response to UNE-P service requests (Request Type M, Activity Type C) submitted via the Local Exchange Navigation System (LENS) interface that is inconsistent with the BellSouth Business Rules for Local Ordering (Issue 10.3.1-10.4) in reference to hunting field requirements.

#### Current issue:

KPMG Consulting is currently reviewing the BellSouth Response to this

Observation. Still awaiting a BellSouth date for the defect fix. KPMG Consulting is currently using a work around for hunting orders.

Observation 173 TVV1 Order Management

27-Mar-02

27-Mar-02

KPMG Consulting has not received timely address validation query (AVQ) pre-orders submitted via the Telecommunications Access Gateway.

Current issue:

KPMG Consulting is currently reviewing the BellSouth Response to Observation

Observation 174 TVV11 Billing

17-Apr-02

27-Mar-02

BellSouth transmitted Billing Data Tape (BDT) files that contained a value that is not defined within the CABS Billing Output Specifications.

Current issue:

No further action is required.

Observation 175

TVV2 Order Management

27-Mar-02

24-Apr-02

Closed

KPMG Consulting has not received expected responses for local service requests (LSRs) submitted via the Telecommunications Access Gateway (TAG) interface.

Current issue:

# Date of First Call Latest activity

Observation 176 PMR5 Metrics

27-Mar-02

03-May-02

Open

KPMG Consulting cannot replicate the values in the Provisioning: Average Completion Notice Interval Service Quality Measurement (SQM) report for the CLEC Aggregate (August 2001). KPMG Consulting found that BellSouth's instructions in the Raw Data User Manual are insufficient for calculating the metrics values for this SQM.

### Current issue:

KPMG Consulting is currently reviewing BellSouth data related to this observation.

Observation 177 TVV4

Repair, Provisioning & Maintenance

03-Apr-02

24-Apr-02

Closed

BellSouth's systems or representatives have not consistently provisioned service and features as specified in orders submitted by KPMG Consulting.

#### Current issue:

No further action is required.

Observation 178 PMR2 Metrics

10-Apr-02

01-May-02

Closed

KPMG Consulting has found that BellSouth's method of sampling records used for the calculation of the Provisioning: Service Order Accuracy Service Quality Measurement (SQM) may produce biased estimates.

## Current issue:

No futher action is required.

Observation 179 PMR5 Metrics

10-Apr-02

19-Apr-02

Open

KPMG Consulting cannot replicate the values in the Ordering: LNP-Percent Rejected Service Requests Service Quality Measurement (SQM) report for the CLEC Aggregate (August 2001). KPMG Consulting found that BellSouth's instructions in the Raw Data User Manual are insufficient for calculating the metrics values for this SQM.

#### Current issue:

KPMG Consulting is currently reviewing BellSouth data related to this amended observation.

Observation 180 PMR2 Metrics

10-Apr-02

10-Apr-02

Open

KPMG Consulting has found that BellSouth's method of sampling records used for the calculation of the Database Update Information: Percent Database Update Accuracy Service Quality Measurement (SQM) may produce inaccurate results.

#### Current issue:

KPMG Consulting is currently awaiting the BellSouth Response to this observation.

Date of First Call Latest activity

Observation 181

TVV11 Billing

17-Apr-02

01-May-02

BellSouth's published business rule for calculating fractional charges does not yield correct results.

#### Current issue:

No further action is required.

**Observation** 182 PPR5

Relationship Management Infrastructure

17-Apr-02

17-Apr-02

Open

BellSouth does not follow the documented process for extending a test agreement with a Competitive Local Exchange

#### Current issue:

KPMG Consulting is currently reviewing the BellSouth Response to this

Observation 183 TVV1

Order Management

24-Apr-02

24-Apr-02

BellSouth provides inconsistent information on Firm Order Confirmation (FOC) responses for Resale and UNE-P service requests submitted via BellSouth's Telecommunications Access Gateway (TAG) and Electronic Data Interchange (EDI)

#### Current issue:

KPMG Consulting is currently awaiting the BellSouth Response to this observation.

Observation

184

TVV1 **Order Management**  24-Apr-02

24-Apr-02

Open

KPMG Consulting has not received timely fully mechanized Unbundled Network Elements-Loop (UNE-L) Firm Order Confirmations (FOCs) from BellSouth's Electronic Data Interchange (EDI) interface.

#### Current issue:

KPMG Consulting is currently awaiting the BellSouth Response to this observation.

Observation 185

PMR5

Metrics

01-May-02

01-May-02

Open KPMG Consulting cannot replicate the values in the Provisioning: Coordinated Customer Conversions -Hot Cut Timeliness % Within Interval and Average Interval Service Quality Measurement (SQM) report for the CLEC Aggregate (August 2001). KPMG Consulting found that BellSouth's reported time buckets and the time buckets in the Florida Interim Performance Metrics SQM (Version 3.00) are inconsistent. The instructions in the Raw Data User Manual (RDUM) are also insufficient for calculating the metrics values for this SQM.

# Current issue:

KPMG Consulting is currently reviewing the BellSouth Response to this

# Date of First Call Latest activity

Observation 186

TVV1

**Order Management** 

01-May-02

01-May-02

KPMG Consulting has not received timely Unbundled Network Elements (UNE) Loop Completion Notices (CNs) submitted via the Telecommunications Access Gateway (TAG) interface.

Current issue:

KPMG Consulting is currently reviewing the BellSouth Response to this

Observation

187

TVV2 **Order Management**  01-May-02

01-May-02

Open

BellSouth systems provide inaccurate auto clarifications (CLRs) for local service requests (LSRs) submitted via the Local Exchange Navigation System (LENS) interface.

Current issue:

KPMG Consulting is currently reviewing the BellSouth Response to this

Observation 188

TVV2

Order Management

01-May-02

01-May-02

KPMG Consulting has not received fully mechanized responses for local service requests (LSRs) submitted via Electronic Data Interchange (EDI) and the Telecommunications Access Gateway (TAG) interfaces.

KPMG Consulting is currently reviewing the BellSouth Response to this

Observation 189

TVV1 **Order Management**  01-May-02

01-May-02

BellSouth's Telecommunications Access Gateway API Reference Guide is inconsistent with the BellSouth Pre-Order Business Rules in reference to the requirement of the Transaction Type (TXTYP) field for the Parsed Customer Service Record Query (PCSRQ) submitted via the TAG interface.

KPMG Consulting is currently reviewing the BellSouth Response to this

PMR5

Observation 190

Metrics

01-May-02

03-May-02

KPMG Consulting cannot replicate the values in the Provisioning: Average Completion Notice Interval Service Quality Measurement (SQM) report for the Test CLEC (September 2001).

KPMG Consulting is currently reviewing the BellSouth Response to this

## Date of First Call Latest activity

01-May-02

Observation 192 TVV2 Order Management 01-May-02 Open 01-May-02

KPMG Consulting did not receive a response to a Local Service Request (LSR) submitted to BellSouth via facsimile (fax).

#### Current issue:

KPMG Consulting is currently reviewing the BellSouth Response to this

Observation193TVV3Order Management01-May-0201-May-02Open

KPMG Consulting received flow-through Firm Order Confirmations (FOCs) on Local Service Requests (LSRs) with order activities not documented as flow-through eligible.

#### Current issue:

KPMG Consulting is currently awaiting the BellSouth Response to this observation.

Observation 194 TVV11 Billing 01-May-02 03-May-02

Four of BellSouth's UNE and UNE-P test CLEC bills have been released to the Post Office later than eight calendar days after the bill date.

## Current issue:

KPMG Consulting is currently reviewing the BellSouth Response to this

Observation195PMR5Metrics01-May-0201-May-02Onen

KPMG Consulting cannot replicate the values in the Ordering: Reject Interval (Non-Trunks) Service Quality Measurement (SQM) report for the CLEC Aggregate (September 2001). KPMG Consulting found that BellSouth's instructions in the Raw Data User Manual (RDUM) are insufficient for calculating the metrics values for this SQM.

### Current issue:

KPMG Consulting is currently reviewing the BellSouth Response to this

Observation 196 PMR5 Metrics 08-May-02 08-May-02

BellSouth's Service Quality Measurement (SQM) reports for the KPMG Consulting test CLEC list no data returned, despite KPMG Consulting test CLEC calculations which indicate that values should be returned.

### Current issue:

KPMG Consulting is currently awaiting the BellSouth Response to this observation.

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# Date of First Call Latest activity

Exception Closed

*1* P

Relationship Management Infrastructure

10-Aug-00

09-Nov-00

BellSouth's electronic data interchange (EDI) test environment is inadequate for testing of a CLEC's EDI interface. The EDI test environment does not allow a CLEC to fully test Local Number Portability (LNP) without the use of live customers.

Current issue:

No further action is required.

Exception

PPR5

Relationship Management Infrastructure

17-Aug-00

08-Feb-01

Closed

Inconsistencies and omissions in the BellSouth EDI Specifications Guide (EDI Specifications) and the BellSouth Rules for Local Ordering – OSS99 (Business Rules) prevent the development of an EDI interface between BellSouth and a CLEC.

Current issue:

No further action is required.

Exception

3 PPR5

Relationship Management Infrastructure

17-Aug-00

09-Nov-00

Closed

The test cases BellSouth provides a CLEC for electronic data interchange (EDI) end-to-end testing are either incomplete or

Current issue:

No further action is required.

Exception

4

PPR2

Relationship Management Infrastructure

17-Aug-00

19-Jul-01

Closed

BellSouth does not have documented procedures for interaction with CLECs during the account establishment and management process.

Current issue:

No further action is required.

Exception Closed

5 PPR1

Relationship Management Infrastructure

31-Aug-00

18-Jan-01

BellSouth does not follow their documented process of providing proper time intervals when posting documentation changes.

Current issue:

## Date of First Call Latest activity

Exception Closed

**6** F

Relationship Management Infrastructure

05-Oct-00

21-Mar-02

BellSouth lacks an appropriate process, methodology and a robust test environment for testing of the electronic data interchange (EDI) interface.

## Current issue:

No further action required.

Exception Closed

7 PPR5

Relationship Management Infrastructure

12-Oct-00

22-Jun-01

BellSouth does not have sufficient, publicly available, documentation that provides information to a CLEC about how to establish physical connectivity with the Electronic Communications Trouble Administration (ECTA) interface.

#### Current issue:

No further action is required.

Exception

8

Relationship Management Infrastructure

19-Oct-00

16-Aug-01

Closed

Bell South lacks a consistent and documented process to enable a CLEC to independently develop an Electronic Communications Trouble Administration (ECTA) interface.

#### Current issue:

No further action is required.

Exception

9

PPR4

PMR5

PPR<sub>5</sub>

Relationship Management Infrastructure

30-Nov-00

05-Apr-01

Closed

BellSouth does not have documented procedures for the CLEC training management practices and program administration.

## Current issue:

No further action is required.

Exception

10

Metrics

14-Dec-00

05-Feb-02

KPMG Consulting has found that BellSouth's implemented metrics calculations for the "Ordering: Local Number Portability (LNP) – Reject Interval" Service Quality Measurement report (May 2000) are inconsistent with the documented metrics

#### Current issue:

KPMG Consulting is currently awaiting March 2002 data.

Monday, May 06, 2002

# Date of First Call Latest activity

Exception 11 PMR5 Metrics Closed

14-Dec-00

13-Sep-01

KPMG Consulting has found that BellSouth's implemented metrics calculations for the Ordering: Local Number Portability (LNP) Firm Order Confirmation Timeliness Service Quality Measurement report (May 2000) are inconsistent with the documented metrics calculations

Current issue:

No further action is required.

Exception 12 PPR1 Relationship Management Infrastructure 22-Feb-01 31-Jan-02

Closed

BellSouth does not adhere to the procedures for System Outages (Type 1) established in the BellSouth Change Control Process, version 2.0.

Current issue:

No further action is required.

Exception 13 TVV10 Billing 08-Feb-01 31-Jan-02

Closed

BellSouth failed to deliver at least 95% of Daily Usage File (DUF) records within six calendar days following the date the calls were placed.

Current issue:

No further action is required.

Exception 14 PMR1 Metrics 08-Mar-01 22-Jun-01

Closed

BellSouth has inconsistent retention periods for the unprocessed data that is required to calculate LNP (Local Number Portability) Service Quality Measurements.

Current issue:

No further action is required.

Exception 15 PMR5 Metrics 15-Mar-01 16-Aug-01

Closed

KPMG Consulting cannot determine whether BellSouth is producing complete Service Quality Measurement (SQM) reports, as ordered by the FPSC, for the Metrics Calculations Verification and Validation Review test due conflicting information in the public order from the Florida Public Service Commission.

Current issue:

# Date of First Call Latest activity

Exception

16

Order Management

15-Mar-01

10-Jan-02

The BellSouth Business Rules for Local Ordering -OSS '99, Issue 9K, does not offer CLECs the ability to submit an order for the partial migration of a customer's unbundled (UNE) loops.

Current issue:

This Exception will remain open until release 10.6 is implemented by BellSouth on 07/18/02.

TVV1

Exception

17

TVV1 Order Management 15-Mar-01

24-May-01

Closed

BellSouth does not offer CLECs the ability to Migrate a retail customer to a CLEC using an Enhanced Extended Link (EEL).

Current issue:

No further action is required.

Exception

18

PPR16 Repair, Provisioning & Maintenance

22-Mar-01

19-Apr-01

The BellSouth Network Reliability Center (NRC) fails to provide proactive notification to CLECs on Network/Switch outages affecting their end users.

Current issue:

No further action is required.

Exception

19

TVV1 Order Management 15-Mar-01

22-Mar-01

Withdrawn

BellSouth's Network Services Customer Services does not provide consistent access to Customer Support Manager (CSM) during high-volume for Competitive Local Exchange Carriers (CLEC) calls.

<u>Current issue:</u> Withdrawn by KPMG Consulting.

Exception Closed

20 PPR5 Relationship Management Infrastructure

21-Mar-01

06-Sep-01

BellSouth does not appear to have public documentation available for CLECs to establish connectivity for TAG, one of their preordering and ordering interfaces.

Current issue:

# Date of First Call Latest activity

Exception

21

PMR5 Metrics

21-Mar-01

24-May-01

Closed

KPMG Consulting cannot replicate the values in the "Ordering: Local Number Portability (LNP) – Percent Rejected Service Requests" Service Quality Measurement (SQM) report for the CLEC Aggregate (January 2001). KPMG Consulting found that BellSouth's instructions are insufficient for calculating the metrics values for this SQM.

#### Current issue:

No further action is required.

Exception

*22* 

PMR5

Metrics

21-Mar-01

28-Feb-02

Closed

KPMG Consulting cannot replicate the values in the "Provisioning: Local Number Portability (LNP) – Disconnect Timeliness Interval & Average Disconnect Timeliness Interval" Service Quality Measurement (SQM) report for the CLEC Aggregate (May 2000). KPMG Consulting found that BellSouth's instructions are insufficient for calculating the metrics values for this

## Current issue:

No further action is required.

Exception

*23* 

PPR1 Relat

Relationship Management Infrastructure

21-Mar-01

02-Aug-01

Closed

The distribution of Carrier Notification information associated with the BellSouth Change Control Process is not adequate. Furthermore, in BellSouth's implementation of the process, significant information is not included in the Carrier Notifications.

## Current issue:

No further action is required.

Exception

24

Metrics

21-Mar-01

24-May-01

Close

KPMG Consulting cannot replicate the values in the "Provisioning: Local Number Portability (LNP) – Total Service Order Cycle Time" Service Quality Measurement (SQM) report for the CLEC Aggregate (May 2000). KPMG Consulting found that BellSouth's instructions are insufficient for calculating the metrics values for this SQM.

# Current issue:

No further action is required.

Exception

25

PPR5

PMR5

Relationship Management Infrastructure

21-Mar-01

22-Jun-01

Closed

BellSouth does not have public documentation available for CLECs to correlate the available version(s) of the Telecommunications Access Gateway (TAG) interface with either the BellSouth Business Rules for Local Ordering OSS 99 or the BellSouth Pre-Order Business Rules.

#### Current issue:

# Date of First Call Latest activity

Exception Closed

26

Relationship Management Infrastructure

21-Mar-01

14-Jun-01

BellSouth does not have a clearly defined process for addressing the expedited release of BellSouth documentation defects.

# Current issue:

No further action is required.

Exception

27

Metrics

21-Mar-01

13-Feb-02

Closed

KPMG Consulting cannot replicate the values in the "Provisioning: Troubles Within 30 Days of Provisioning (Non-Trunks)" Service Quality Measurement (SQM) report for the CLEC Aggregate (May 2000).

#### Current issue:

No further action is required.

Exception

28

TVV1

PMR5

Order Management

21-Mar-01

24-May-01

Closed

The BellSouth Business Rules for Local Ordering -OSS99, Issue 9K, provides ambiguous information on conditional usage notes of the LOCACT field, a conditional field on the EU form when submitted via the Telecommunications Access Gateway

## Current issue:

No further action is required.

Exception Closed

29

TVV10 Billing

21-Mar-01

19-Jul-01

BellSouth improperly populates the "ToNumber" field in the related Daily Usage File (DUF) record for customer service calls (611 calls) placed from telephone numbers within the "407" area code.

# Current issue:

No further action is required.

Exception Closed

30

TVV10 Billing

21-Mar-01

19-Jul-01

BellSouth has improperly populated the "ToNumber" field in the Access Daily Usage File (ADUF) records for certain long

# Current issue:

# Date of First Call Latest activity

Exception

31

TVV10 Billing

21-Mar-01

19-Jul-01

Closed

BellSouth failed to deliver Daily Usage File (DUF) records for toll free calls.

#### Current issue:

No further action is required.

Exception

*32* 

TVV1 Order Management 12-Mar-01

19-Jul-01

Closed

The BellSouth Business Rules for Local Ordering -OSS '99, Issue 9K, provides information inconsistent with the system responses being generated in reference to the Carrier Identification Code field, a conditional field on the Local Service

## Current issue:

No further action is required.

Exception

33

TVV3

Order Management

21-Mar-01

19-Jul-01

BellSouth Flow -Through documentation is incomplete and inconsistent, specifically the Flow -Through Ordering Matrix, Flow-Through Parameters, and the BellSouth Service Quality Measurement Plan LSR Flow-Through Matrix.

## Current issue:

No further action is required.

Exception Closed

34

Order Management

22-Mar-01

14-Jun-01

BellSouth does not have detailed and fully documented guidelines for Customer Support Manager interaction with CLECs during the ordering process.

# Current issue:

No further action is required.

Exception

35

PPR14 Repair, Provisioning & Maintenance

29-Mar-01

17-Jan-02

BellSouth processes for responding to customer requests for earlier appointments in the CWINS Center differ from those in the Small Business Telecommunications Center resulting in a disparity in service between wholesale and retail.

# Current issue:

# Date of First Call Latest activity

Exception

36

PMR4 Metrics 29-Mar-01

03-May-02

Open

BellSouth does not properly construct the processed data used to validate certain Ordering Service Quality Measurements (Ordering: FOC timeliness (non-trunks) and Reject interval).

 $\underline{\textit{Current issue:}} \\ \mathsf{KPMG Consulting is reviewing clarification information received from BellSouth.} \\$ 

Exception

37

PPR10 Billing

29-Mar-01

13-Dec-01

Closed

BellSouth's Billing Work Center lacks a formal process for identifying and planning for variations in the level of staff required to support work load for the Billing Work Center/Help Desk.

Current issue:

No further action is required.

Exception

38

8VVT

Repair, Provisioning & Maintenance

03-Apr-01

14-Mar-02

Closed

BellSouth's Electronic Communications Trouble Administration (ECTA) system failed to process correctly following an outage and re-initialization.

Current issue:

No further action is required.

Exception

39

Order Management

05-Apr-01

26-Jul-01

A Local Service Office (LSO) field is not provided in the LENS interface where required for Port/Loop request types per BellSouth Business Rules for Local Ordering - OSS99, Issue 9K.

Current issue:

No further action is required.

Exception

40

TVV1 Order Management 12-Apr-01

23-Aug-01

Closed

The Local Exchange Navigation System (LENS) interface does not consistently address service requests for ISDN UNE

Current issue:

Date of First Call Latest activity

Exception Closed

41

TVV1 Order Management

11-Apr-01

28-Sep-01

BellSouth does not consistently apply its Universal Service Order Code (USOC) business rules to requests for Unbundled Network Switched Combinations (REQTYP M)

### Current issue:

No further action is required.

Exception

**42** TVV1

Order Management

12-Apr-01

28-Feb-02

Closed

The Telecommunications Access Gateway (TAG) interface does not accurately implement the End User information requirements contained in The BellSouth Business Rules for Local Ordering –OSS '99, Issue 9L.

#### Current issue:

No further action is required.

Exception

43

TVV11 Billing

12-Apr-01

14-Feb-02

Closed

BellSouth Resale bills fail to reflect usage charges for calls made by KPMG Consulting during the course of the Functional Usage Evaluation.

## Current issue:

No further action is required.

Exception

44

TVV11 Billing

11-Apr-02

Open

BellSouth issued CABS bills which reflect incorrect quantities for Unbundled Switching and Transport usage.

#### Current issue:

KPMG Consulting is reviewing the BellSouth Response to 4th Amended Exception

Exception Closed

45

TVV1

Order Management

19-Apr-01

05-Dec-01

BellSouth Business Rules for Local Ordering - OSS99, Issue 9L, contains inconsistent and incomplete instructions necessary for Competitive Local Exchange Carriers (CLECs) to access and use BellSouth's systems.

## Current issue:

# Date of First Call Latest activity

Exception

46

TVV1 Order Management

23-Aug-01

Closed

The Telecommunications Access Gateway (TAG) and the Electronic Data Interchange (EDI) interfaces do not accurately apply The BellSouth Business Rules for Local Ordering –OSS '99, Issue 9L, in relation to the Directory Listing (DL) form

#### Current issue:

No further action is required.

Exception

47 TVV11 Billing

16-Aug-01

Closed

KPMG CLEC bills do not reflect unbundled transport shared usage for calls made to points greater than 35 miles from the originating central offices.

## Current issue:

No further action is required.

Exception

48

PPR9 Repair, Provisioning & Maintenance

09-Aug-01

Closed

BellSouth appears not to have formal and documented processes for capacity management in several functional centers that are involved in the provisioning of retail, resale and wholesale orders.

#### Current issue:

No further action is required.

Exception

49

TVV1 Order Management

03-May-01

31-Jan-02

Open

The BellSouth Business Rules for Local Ordering —OSS '99, Issue 9L, does not define a process for an unbundled loop (REQTYP A) service migration (ACT V) request from one CLEC to another CLEC.

# Current issue:

KPMG Consulting is working with a friendly CLEC to test loop migrations.

Exception

*50* 

TVV1 Order Management

03-May-01

23-Aug-01

Closed

BellSouth Business Rules for Local Ordering - OSS99, Issue 9L, does not accurately define the method for successfully completing a Local Service Request (LSR) for a Directory Listing (REQTYP J) with ACT N or ACT R.

# Current issue:

# Date of First Call Latest activity

Exception Closed

*51* 

TVV1 Order Management

03-May-01

24-Jan-02

KPMG Consulting has not received timely mechanized rejects from BellSouth's Electronic Data Interchange(EDI) interface.

#### Current issue:

No further action is required.

Exception

*52* 

TVV1

Order Management

10-May-01

12-Jul-01

Withdrawn

KPMG Consulting did not receive timely mechanized Firm Order Confirmations (FOCs) from BellSouth's Telecommunications Access Gateway (TAG) interface.

#### Current issue:

Exception is withdrawn. No further action is required.

Exception

*53* 

TVV1 Order Management

10-May-01

12-Jul-01

Withdrawn

KKPMG Consulting has not received timely mechanized Firm Order Confirmations (FOCs) from BellSouth's Electronic Data Interchange (EDI) interface.

# Current issue:

Exception is withdrawn

Exception Closed

*54* 

TVV1

Order Management

10-May-01

14-Mar-02

KPMG Consulting has not received timely mechanized rejects from BellSouth's Telecommunications Access Gateway (TAG)

## Current issue:

No further action is required.

Exception Closed

*55* 

TVV1

Order Management

23-Aug-01

Loop Conversions via LENS interface are receiving errors that are inconsistent with BellSouth Business Rules for Local Ordering - OSS99, Issue 9K.

# Current issue:

Date of First Call Latest activity

Exception

56

PMR5 Metrics 26-Jul-01

KPMG Consulting has found that BellSouth's implemented metrics calculations for the "Ordering: Reject Interval (Trunks)" SQM report (March 2001) are inconsistent with the documented metrics calculations.

Current issue:

No further action is required.

Exception

57

Order Management

29-Nov-01

Closed

BellSouth does not have detailed guidelines for CLEC interaction with the Complex Resale Support Group (CRSG) during the ordering process.

Current issue:

No further action required.

Exception

58

TVV1

PPR8

**Order Management** 

16-Aug-01

Closed

KPMG Consulting has not received timely mechanized rejects from BellSouth's Robust Telecommunications Access Gateway (ROBOTAG) interface.

Current issue:

No further action is required.

Exception

59

PMR2 Metrics 24-May-01

19-Jul-01

KPMG Consulting has found that BellSouth's stated Business Rules in the Florida Interim Performance Metrics document for the "Operations Support Systems: Interface Availability (Pre-Ordering)" and "Operations Support Systems: Interface Availability (Maintenance & Repair)" Service Quality Measurements (SQMs) are ambiguous.

Current issue:

No further action is required.

Exception

60

TVV11 Billing

24-May-01

13-Dec-01

Closed

BellSouth failed to cease billing on disconnected auxiliary lines.

Current issue:

# Date of First Call Latest activity

Exception

61

TVV1 Order Management

31-May-01

12-Jul-01

Closed

KPMG Consulting has not received timely functional acknowledgements from BellSouth's Electronic Data Interchange (EDI)

Current issue:

Exception is withdrawn. No further action is required.

Exception

*62* 

TVV11 Billing

31-May-01

21-Jan-02

Open

BellSouth bills reflect a rate for a Service Order Mechanized Charge that is inconsistent with the rate contained in the Interconnection Agreement (IA) between BellSouth Telecommunications and the KPMG CLEC.

Current issue:

KPMG Consulting will retest on 03/29/02 when billing rates are effective.

Exception

63

TVV8

Repair, Provisioning & Maintenance

31-May-01

17-Jan-02

Closed

The BellSouth Electronic Communication Trouble Administration (ECTA) system failed to appropriately process 'enterTroubleReport' transactions.

Current issue:

No further action is required.

Exception

64

TVV1

Order Management

29-Nov-01

Closed

BellSouth Business Rules for Local Ordering - OSS99, Issue 9M, contains inconsistent instructions necessary for Competitive Local Exchange Carriers (CLECs) to access and use BellSouth's systems.

Current issue:

No further action is required.

Exception Closed

65

PPR2

Relationship Management Infrastructure

07-Jun-01

29-Nov-01

The BellSouth Account Management Team does not have processes or documentation related to CLEC Collocation.

Current issue:

# Date of First Call Latest activity

Exception

66

Order Management

14-Jun-01

16-Aug-01

BellSouth's Unbundled Dedicated Transports EELs CLEC Information Package and BellSouth's Unbundled Dedicated Transports - Non-Switched Combinations CLEC Information Package do not provide accurate information that identify applicable Network Code (NC) and Secondary Network Code (SECNCI) for loop (REQTYP A) service requests.

# Current issue:

No further action is required.

Exception

67

Relationship Management Infrastructure

14-Jun-01

29-Nov-01

Closed

The Account Establishment and Management Process does not have defined processes or documentation related to the management of CLEC billing issues and activities.

## Current issue:

No further action is required.

Exception

68

TVV1

Order Management

21-Jun-01

29-Nov-01

Closed

BellSouth has no record of xDSL Local Service Requests (LSRs) that were submitted by KPMG Consulting via the Electronic Data Interchange (EDI) interface.

## Current issue:

No further action is required.

Exception

69

TVV1

Order Management

21-Jun-01

29-Nov-01

BellSouth does not provide an accurate method for assigning the Universal Service Order Code (USOC) to request BellSouth's Operator Services & Directory Assistance (OS/DA) Branding feature.

# Current issue:

No further action is required.

Exception Closed

*70* 

Order Management

21-Jun-01

07-Feb-02

KPMG Consulting did not receive responses to orders sent via facsimile (fax) to the Local Carrier Service Center (LCSC).

# Current issue:

Date of First Call Latest activity

Exception

*71* 

TVV1 Order Management

05-Jul-01

29-Nov-01

KPMG Consulting has not received timely customer service record (CSR) pre-orders submitted via the Telecommunications Access Gateway.

Current issue:

No further action required.

Exception

*72* 

TVV2 Order Management

05-Jul-01

14-Mar-02

Closed

KPMG Consulting has not received responses to multiple Local Service Requests (LSRs) submitted to BellSouth via

Current issue:

No further action is required.

Exception

*73* 

TVV1

Order Management

05-Jul-01

23-Aug-01

Closed

BellSouth is providing error and rejection responses that are inconsistent with the BellSouth Business Rules for Local Ordering - OSS99, for conversion requests for ISDN-BRI Resale service.

Current issue:

No further action is required.

Exception

74

TVV1

Order Management

05-Jul-01

17-Apr-02

Closed

The RoboTAG interface does not provide access to fields that are required for non-designed loop service disconnect (REQTYP A / ACT D) and for ISDN BRI resale service disconnect (REQTYP E / ACT D) requests.

Current issue:

No further action is required.

Exception

*75* 

TVV1

Order Management

05-Jul-01

30-Aug-01

BellSouth's error responses are inconsistent with the BellSouth Business Rules for Local Ordering, OSS99, in reference to conversions of Retail, Resale, and UNE-P accounts to Line Sharing accounts (Request type A/ Activity Type V).

Current issue:

KPMG Consulting is currently working with a friendly CLEC to test migration of Line Sharing.

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# Date of First Call Latest activity

Exception

*76* 

TVV4

Repair, Provisioning & Maintenance

05-Jul-01

31-Jan-02

Open

BellSouth failed to provision disconnect orders properly with the expected intercept recording message.

### Current issue:

KPMG Consulting is currently reviewing the BellSouth Amended Response.

Exception

77

TVV1

Order Management

05-Jul-01

09-Jan-02

Closed

BellSouth Local Service Request (LSR) rejection messages are inconsistent with the BellSouth Business Rules for Local Ordering, OSS99 for designed UNE Loop with Number Portability service requests via the Telecommunications Access

#### Current issue:

No further action required.

Exception

*78* 

PMR3

Metrics

05-Jul-01

13-Sep-01

Closed

KPMG Consulting has found that BellSouth's implemented Metrics change control process is inconsistent with its documented Metrics change control process.

# Current issue:

No further action is required.

Exception Closed

*79* 

TVV10 Billing

12-Jul-01

08-Nov-01

BellSouth failed to deliver Daily Usage File (DUF) records for customer service calls (611) to the "561" & "850" area codes.

# Current issue:

No further action required.

Exception

80

TVV1

Order Management

12-Jul-01

13-Dec-01

BellSouth Local Service Request (LSR) rejection messages are inconsistent with the BellSouth Business Rules for Local Ordering, OSS99 in reference to orders requesting an inside move for DS1 accounts.

## Current issue:

# Date of First Call Latest activity

Exception Closed

*81* 

MR2 Metrics

18-Jul-01

24-Oct-01

KPMG Consulting has found that BellSouth's stated Business Rules in the Florida Interim Performance Metrics document for the "Change Management: Notification of CLEC Interface Outages Service Quality Measurement (SQM) are ambiguous.

#### Current issue:

No further activity required.

Exception

*82* 

TVV4

Repair, Provisioning & Maintenance

19-Jul-01

17-Jan-02

Closed

BellSouth's systems have not updated the directory listing databases on the completion date of the completion notice.

#### Current issue:

No further action is required.

Exception

83

TVV10 Billing

19-Jul-01

14-Feb-02

Closed

BellSouth delivered duplicate Daily Usage File (DUF) records.

#### Current issue:

KPMG Consulting has recommended closure and has forwarded the Exception 83

Disposition Report to the FPSC.

Exception

84

TVV4

Repair, Provisioning & Maintenance

19-Jul-01

19-Apr-02

Open

BellSouth failed to use the proper codes when provisioning switch translations.

# Current issue:

KPMG Consulting is reviewing the BellSouth Response to Second Amended

Exception Closed

85

TVV1

Order Management

19-Jul-01

17-Jan-02

KPMG Consulting has not received timely mechanized Resale Firm Order Confirmations (FOCs) from BellSouth's Electronic Data Interchange (EDI) interface.

# Current issue:

Date of First Call Latest activity

Exception

86

TVV3 Order Management

19-Jul-01

22-Feb-02

Open

KPMG Consulting did not receive flow through Firm Order Confirmations (FOC) on Local Service Requests (LSR) submitted electronically via the mechanized ordering process.

## Current issue:

Retesting is currently underway.

Exception

*87* 

TVV1 Order Management

19-Jul-01

19-Dec-01

Open

BellSouth's Telecommunications Access Gateway (TAG) interface experiences various backend resource limitation exceptions that affect the transmission of local service requests and pre-order queries.

#### Current issue:

BellSouth will address the BRL issues in a 07/26/02 release.

Exception

88

PPR1

Relationship Management Infrastructure

01-May-02

Open

The BellSouth Change Control Prioritization Process does not allow CLECs to prioritize all Change Requests that effect CLEC business.

## Current issue:

KPMG Consulting is currently reviewing BellSouth's 2nd Amended Response to 2nd Amended Exception 88.

Exception

89

TVV1

Order Management

09-Jan-02

Closed

BellSouth's Local Exchange Navigation System (LENS) 9.2 is inconsistent with the BellSouth Business Rules for Local Ordering, OSS99, issue 9M.

# Current issue:

No further action is required.

Exception Open

90

TVV1 Order Management

26-Jul-01

24-Jan-02

KPMG Consulting did not receive timely Non-Mechanized Firm Order Confirmations (FOCs) from BellSouth via fax and

<u>Current issue:</u> Retest activities are currently underway.

# Date of First Call Latest activity

Exception

91

VV1 Order Management

02-Aug-01

06-Sep-01

Withdrawn

KPMG Consulting has not received timely partially mechanized rejects from BellSouth's Electronic Data Interchange (EDI)

Current issue:

No further action is required.

Exception

92

TVV1 Order Management

02-Aug-01

06-Sep-01

Withdrawn

KPMG Consulting has not received timely partially mechanized Firm Order Conformations (FOCs) from BellSouth's Electronic Data Interchange (EDI) interface.

Current issue:

No further action is required.

Exception

93

TVV

Order Management

09-Aug-01

06-Sep-01

Withdrawn

KPMG Consulting has not received timely partially mechanized Firm Order Conformations (FOCs) from BellSouth's Local Exchange Navigation System (LENS) interface.

Current issue:

No further action is required.

Exception

94

PPR 7 8 Order Management

09-Aug-01

29-Nov-01

Closed

BellSouth does not have complete documented processes for capacity management at the Local Carrier Service Center (LCSC) locations that are involved in processing wholesale orders and providing customer support.

Current issue:

No further action is required.

Exception Closed

95

PPR2

Relationship Management Infrastructure

16-Aug-01

29-Nov-01

The Account Establishment and Management Process does not have defined processes or documentation related to the management and resolution of Metrics issues.

Current issue:

Date of First Call Latest activity

Exception Open

96

TVV11 Billing

16-Aug-01

29-Mar-02

BellSouth delivered Resale bills to KPMG Consulting reflecting incorrect usage charges for calls made by KPMG Consulting during the course of the Functional Carrier Bill Evaluation.

### Current issue:

KPMG Consulting is reviewing the BellSouth Response to 4TH Amended Exception

Exception

**97** TVV1

Order Management

06-Sep-01

Withdrawn

KPMG Consulting has not received timely Non-Mechanized rejects from BellSouth via fax and electronic mail.

Current issue:

No further action is required.

Exception

98

TVV1

Order Management

16-Aug-01

24-Jan-02

Closed

BellSouth has transmitted Completion Notices (CN) using an incorrect Transaction Set (ST) via the Electronic Data Interchange (EDI) interface.

## Current issue:

No further action is required.

Exception

99

TVV2

Order Management

30-Aug-01

09-Dec-01

Closed

KPMG Consulting has not received fully mechanized responses to multiple Local Service Requests (LSRs) submitted to BellSouth's Electronic Data Interchange (EDI) interface.

# Current issue:

No further action required.

Exception Closed

100

TVV1 O

Order Management

30-Aug-01

07-Feb-02

KPMG Consulting has not received timely mechanized Unbundled Network Elements – Loop (UNE-L) Firm Order Confirmations (FOCs) from BellSouth's Electronic Data Interchange (EDI) interface. This exception was originally issued as

# Current issue:

Date of First Call Latest activity

Exception *101* PMR5 Metrics 30-Aug-01

30-Apr-02

KPMG Consulting cannot replicate the values in the Provisioning: Total Service Order Cycle Time Service Quality Measurement (SQM) report for the CLEC Aggregate (January 2001). This exception was originally issued as Observation

<u>Current issue:</u>
KPMG Consulting is currently reviewing clarifying information provided by BellSouth on 4/30/02.

Exception *102* TVV1 Order Management 30-Aug-01 17-Jan-02 Closed

The RoboTAG interface fails to provide Miscellaneous Account Numbers (MANs) for all cities in Florida.

#### Current issue:

No further action is required.

Exception *103* PPR8 Order Management 06-Sep-01 14-Mar-02 Closed

BellSouth does not have documented guidelines for CLEC interaction with the Local Carrier Service Center (LCSC) Fleming Island Call Center.

# Current issue:

No further action is required.

Exception 104 TVV2 06-Sep-01 29-Nov-01 Order Management

KPMG Consulting has not received timely responses for the pre-order queries, Appointment Availability (AAQ), Address Validation (AVQ), Address Validation by Telephone Number (AVQ\_TN), Customer Service Record (CSRQ), Service Availability (SAQ) and Telephone Number Assignment (TNAQ) submitted via the Robust Telecommunications Access

#### Current issue:

No further action required.

*105* Exception TVV1 Order Management 06-Sep-01 17-Jan-02 Closed

KPMG Consulting has not received responses to several Local Service Requests (LSRs) using the Electronic Data Interchange (EDI) interface.

## Current issue:

Date of First Call Latest activity

Exception

*106* 

Relationship Management Infrastructure

14-Feb-02

Closed

The BellSouth IT Team does not have criteria to develop the scope of a Release Package.

Current issue:

No further action is required.

Exception

107

TVV2 Order Management 06-Sep-01

23-Jan-02

Closed

KPMG Consulting has not received fully mechanized responses to multiple Local Service Requests (LSRs) submitted to BellSouth's Telecommunications Access Gateway (TAG) interface.

Current issue:

No further action required.

Exception

*108* 

TVV2 Order Management

06-Sep-01

11-Oct-01

Withdrawn

KPMG Consulting has not received timely responses for the pre-order queries Appointment Availability (AAQ), Address Validation (AVQ), Service Availability (SAQ) and Telephone Number Assignment (TNAQ) submitted via the Telecommunications Access Gateway (TAG).

Current issue:

No further action required.

Exception

109

Metrics

12-Sep-01

24-Apr-02

KPMG Consulting cannot replicate the values in the "Ordering: Acknowledgement Message Timeliness" Service Quality Measurement (SQM) report for the CLEC Aggregate (May 2001).

Current issue:

No further action is required.

Exception

110

PPR8

PMR5

Order Management

03-Oct-01

16-Apr-02

Open

BellSouth does not have adequate guidelines for call tracking and resolution at its Local Carrier Service Center (LCSC).

KPMG Consulting is reviewing the BellSouth Amended Response to this exception.

## Date of First Call Latest activity

Exception

111

TVV11 Billing

03-Oct-01

31-Jan-02

Closed

BellSouth's policy of retaining Resale call detail for thirty (30) days after the bill period date is inadequate for bill reconciliation and claims investigation.

<u>Current issue:</u>

No further action is required.

Exception

112 TVV4

Repair, Provisioning & Maintenance

03-Oct-01

25-Mar-02

BellSouth's systems or representatives have not consistently provisioned service and features as specified in orders submitted by KPMG Consulting.

Current issue:

KPMG Consulting released 3RD Amended Exception 112 on 03/25/02 and is currently planning for a second retest.

Exception

113

PMR4

PMR4

Metrics

11-Oct-01

04-Feb-02

Open

KPMG Consulting has found that BellSouth does not capture xDSL transactions, which are processed through Corporate Order Gateway (COG), for the "Ordering: Percent Flow-Through Service Requests (Summary)" and "Ordering: Percent Flow-Through Service Requests (Detail)" Service Quality Measurements (SQMs).

<u>Current issue:</u>

KPMG Consulting is currently monitoring the issues identified in this exception and will integrate retesting into the transition to PMAP 4.0 process.

Exception

114

Metrics

11-Oct-01

07-Dec-01

BellSouth incorrectly excludes data between the BARNEY Snapshots and NODS stages of the PMAP process that go into the calculation of the fully mechanized and partially mechanized orders for the "Ordering: Firm Order Confirmation (FOC) Timeliness (Non-Trunks)" Service Quality Measurement (SQM) for June 2001 data.

KPMG Consulting is currently monitoring the issues identified in this exception and will integrate retesting into the transition to PMAP 4.0 process.

Exception

115

PMR5 Metrics 18-Oct-01

07-Nov-01

Closed

KPMG Consulting has found that BellSouth's implemented metrics exclusions for the Operations Support Systems: Loop Makeup Response Time Manual Service Quality Measurement (SQM) report (May 2001) are inconsistent with the documented metrics exclusions.

Current issue:

# Date of First Call Latest activity

Exception

116

TVV2 Order Management

08-Nov-01

21-Mar-02

Open

BellSouth representatives did not provide expected responses to Local Service Requests (LSRs) submitted by KPMG Consulting via facsimile (fax).

Current issue:

KPMG Consulting is preparing a third amendment to Exception 116. Retesting

Exception

117

TVV1 Order Management

08-Nov-01

11-Jan-02

Open

KPMG Consulting has not received manual Firm Order Confirmations (FOC) on orders that have been assigned a Completed (CP) or Pending (PD) Status in Bellsouth's Customer Service Order Tracking System (CSOTS).

Current issue:

Retest activities are currently underway.

Exception

*118* 

TVV2

Order Management

14-Nov-01

17-Jan-02

Closed

KPMG Consulting has received invalid responses for pre-order queries submitted via the Telecommunications Access Gateway (TAG) interface.

Current issue:

No further action is required.

Exception

119

Metrics

14-Nov-01

30-Apr-02

Oper

KPMG Consulting has discovered that BellSouth is not adhering to the documented metrics change control process for tracking changes in TeamConnection.

Current issue:

KPMG Consulting is currently reviewing a clarification response provided by

PMR3

Exception

*120* 

PMR4 Metrics

15-Nov-01

07-Feb-02

Open
BellSouth incorrectly excludes data between Barney snapshots and NODS stages of the PMAP process that go into the calculation of the fully mechanized and partially mechanized orders for the "Ordering: Percent Rejected Service Requests (Non-Trunks)" Service Quality Measurement (SQM) for June 2001 data.

Current issue:

KPMG Consulting is reviewing the BellSouth Red line SQM.

# Date of First Call Latest activity

Exception 121 TVV3 Order Management

15-Nov-01

04-Feb-02

Open

KPMG Consulting could not identify flow through Firm Order Confirmations (FOCs) on Local Number Portability (LNP) Local Service Requests (LSRs) submitted electronically via the mechanized ordering process.

#### Current issue:

Retest activities are underway.

Exception 122 TVV3 Order Management

15-Nov-01

24-Apr-02

Open

BellSouth did not provide flow through classification information for Digital Subscriber Line (DSL) orders submitted by KPMG Consulting.

#### Current issue:

KPMG Consulting is currently reviewing the BellSouth Amended Response to this exception.

Exception 123

PPR1 Relationship Management Infrastructure

05-Dec-01

26-Apr-02

Open

BellSouth is not classifying Change Requests as defects in accordance with the BellSouth definition of a Defect.

#### Current issue:

KPMG Consulting is currently reviewing updated BellSouth documentation.

Exception 124 PMR5 Metrics

12-Dec-01

04-Feb-02

Open

KPMG Consulting cannot replicate the values for the "Ordering: Percent Flow-Through Service Requests (Detail)" Service Quality Measurement (SQM) report for the CLEC Aggregate (November 2000).

#### Current issue:

KPMG Consulting is retesting June 2001 data.

Exception 125 PMR4 Metrics Closed

13-Dec-01

14-Feb-02

BellSouth incorrectly includes multiple instances of the same Service Order Number in NODS for the "Provisioning: Average Completion Notice Interval (ACNI)" Service Quality Measurement (SQM) for June 2001 data.

## Current issue:

No further action is required.

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# Date of First Call Latest activity

Exception Closed

126

TVV2 Order Management 20-Dec-01

17-Jan-02

KPMG Consulting has not received timely mechanized rejects and auto-clarifications from BellSouth's Electronic Data Interchange (EDI) interface.

#### Current issue:

No further action is required.

Exception

127 TVV2

Order Management

20-Dec-01

14-Feb-02

Closed

KPMG Consulting was unable to transmit pre-orders through the Local Exchange Navigation System.

#### Current issue:

No further action required.

Exception

128

PPR5

Relationship Management Infrastructure

20-Dec-01

07-Feb-02

Open

BellSouth does not support Pre-Order testing in the CLEC Application Verification Environment (CAVE).

# Current issue:

KPMG Consulting is conducting CLEC interviews and analysis and is awaiting further information from BellSouth.

Exception

129

TVV1

Order Management

09-Jan-02

11-Jan-02

KPMG Consulting has not received timely partially mechanized Firm Order Confirmations (FOCs) from BellSouth's Local Exchange Navigation System (LENS) interface.

#### Current issue:

Retest activities are underway.

Exception Open

*130* 

TVV4

Repair, Provisioning & Maintenance

09-Jan-02

25-Mar-02

BellSouth's systems or representatives did not consistently provision service in a timely manner for orders submitted by KPMG Consulting (TVV4). This Exception was originally issued as Observation 141.

KPMG Consulting released 2ND Amended Exception 130 and is preparing Central Office visits for the first two weeks in April.

# Date of First Call Latest activity

Exception

131

Order Management

09-Jan-02

15-Jan-02

KPMG Consulting has not received timely partially mechanized Firm Order Confirmations (FOCs) from BellSouth's Electronic Data Interchange (EDI) interface.

Current issue:

Retest activities are underway.

Exception

132

PMR5

TVV1

Metrics

09-Jan-02

21-Mar-02

Closed

KPMG Consulting cannot replicate the values in the "Ordering: Local Number Portability (LNP) - Firm Order Confirmation (FOC) Timeliness Interval Distribution & Firm Order Confirmation Average Interval" Service Quality Measurement (SQM) report for the CLEC Aggregate (July 2001).

Current issue:

No further action is required.

Exception

133

TVV1

**Order Management** 

09-Jan-02

28-Feb-02

Closed

KPMG Consulting has not received timely fully mechanized Firm Order Confirmations (FOCs) from BellSouth's Robust Telecommunications Access Gateway (ROBOTAG) interface.

Current issue:

No further action is required.

Exception

134

TVV1

Order Management

09-Jan-02

17-Apr-02

KPMG Consulting has not received timely partially mechanized Rejects from BellSouth's Robust Telecommunications Access Gateway (ROBOTAG) interface.

Current issue:

No further action is required.

Exception

135

PMR5

Metrics

16-Jan-02

11-Apr-02

Open

KPMG Consulting cannot replicate the values in the "Provisioning: Average Jeopardy Notice Interval & Percentage of Orders

COAN - report for the CLEC Aggregate (August 2001) Given Jeopardy Notices" Service Quality Measurement (SQM) report for the CLEC Aggregate (August 2001).

KPMG Consulting is currently reviewing the BellSouth Second Amended Response to this exception.

# Date of First Call Latest activity

Exception

*136* 

Order Management

24-Jan-02

29-Apr-02

Open -

KPMG Consulting did not receive flow through Firm Order Confirmations (FOC) on Unbundled Network Element (UNE) Local Service Requests (LSR) submitted electronically via the mechanized ordering process.

Current issue:

KPMG Consulting is currently awaiting the BellSouth Response to the amended

TVV3

Exception

137

TVV2 Order Management

24-Jan-02

14-Feb-02

Closed

KPMG Consulting has not received fully mechanized responses to multiple Local Service Requests (LSRs) submitted to BellSouth's Electronic Data Interchange (EDI) interface.

Current issue:

No further action is required.

Exception

*138* 

TVV11 Billing

24-Jan-02

28-Jan-02

Open

Unbundled Network Element (UNE) billing invoices received from BellSouth fail to reflect credits associated with reduced rates from the amended Interconnection Agreement (IA) between the KPMG Consulting Competitive Local Exchange Carrier (CLEC) CKS and BellSouth.

Current issue:

KPMG Consulting will retest on 03/39/02 when billing rates are effective.

Exception

139

TVV4

Repair, Provisioning & Maintenance

24-Jan-02

19-Mar-02

Ope

BellSouth's Line Loss Report does not provide enough detail for Competitive Local Exchange Carriers (CLECs) to properly identify account activity.

Current issue:

KPMG Consulting is waiting for revised line loss candidate criteria and will be

Exception

140

TVV1 O

Order Management

31-Jan-02

10-Apr-02

Closed KPMG Consu

KPMG Consulting has not received timely partially mechanized Firm Order Confirmations (FOCs) from BellSouth's Telecommunication Access Gateway (TAG) interface.

Current issue:

# Date of First Call Latest activity

Exception Closed

141

TVV1 Order Management 31-Jan-02

06-Mar-02

TVV1

KPMG Consulting has not received timely partially mechanized Rejects from BellSouth's Telecommunications Access Gateway (TAG) interface.

Current issue:

No further action is required.

Exception

142

Order Management

31-Jan-02

06-Mar-02

Closed

KPMG Consulting has not received timely mechanized Rejects from BellSouth's Telecommunications Access Gateway (TAG) interface.

Current issue:

No further action is required.

Exception

143

PMR4 Metrics 07-Feb-02

29-Mar-02

Open

BellSouth incorrectly excludes data between the BARNEY Snapshots and NODS stages of the PMAP process for non-mechanized orders that go into the calculation of the "Ordering: Percent Rejected Service Requests (Non-Trunks)" Service Quality Measurement (SQM) for June 2001 data.

Current issue:

KPMG Consulting is currently monitoring the issues identified in this exception and will integrate retesting into the transition to PMAP 4.0 process.

Exception

144

Metrics

07-Feb-02

29-Mar-02

BellSouth incorrectly excludes data between the BARNEY Snapshots and NODS stages of the PMAP process for non-mechanized orders that go into the calculation of the "Ordering: Reject Interval (Non-Trunks)" Service Quality Measurement (SQM) for June 2001 data.

Current issue:

KPMG Consulting is currently monitoring the issues identified in this exception and will integrate retesting into the transition to PMAP 4.0 process.

Exception

145

PMR4

PMR4

Metrics

07-Feb-02

29-Mar-02

BellSouth incorrectly excludes data between BARNEY Snapshots and NODS stages of the PMAP process that go into the calculation of the non-mechanized orders for the "Ordering: Firm Order Confirmation (FOC) Timeliness (Non-Trunks)" Service Quality Measurement (SQM) for June 2001 data.

Current issue:

KPMG Consulting is currently monitoring the issues identified in this exception and will integrate retesting into the transition to PMAP 4.0 process.

Date of First Call Latest activity

Exception

146

PMR5 Metrics 14-Feb-02

06-Mar-02

Closed

KPMG Consulting cannot replicate the values in the "Maintenance & Repair: Percent Repeat Troubles Within 30 Days" Service Quality Measurement (SQM) report for the CLEC Aggregate (August 2001).

#### Current issue:

No further action is required.

Exception

147 PMR5 Metrics

14-Feb-02

06-Mar-02

Closed

KPMG Consulting cannot replicate the values in the "Maintenance & Repair: Maintenance Average Duration" Service Quality Measurement (SQM) report for the CLEC Aggregate (August 2001).

#### Current issue:

No further action is required.

Exception

148

PPR2

Relationship Management Infrastructure

14-Feb-02

11-Apr-02

Closed

The Account Establishment and Management Process does not have defined processes or documentation related to certain ordering scenarios.

# Current issue:

No further action is required.

Exception

149

TVV10 Billing

14-Feb-02

27-Mar-02

BellSouth failed to deliver Daily Usage File (DUF) records following the completion of a change order, resulting in the receipt of only 88%1 of expected DUF records.

# Current issue:

No further action is required.

Exception

*150* 

PMR4 Metrics 20-Feb-02

27-Mar-02

Closed

BellSouth incorrectly includes multiple instances of the same order in NODS for the Ordering: Firm Order Confirmation (FOC) Timeliness (Non-Trunks) Service Quality Measurement (SQM) for September 2001 data.

#### Current issue:

## Date of First Call Latest activity

Exception

*151* 

PMR5 Metrics 28-Feb-02

22-Feb-02

Open

KPMG Consulting cannot replicate the values in the Provisioning: % Completions/Attempts without Notice or <24 Hours Notice Service Quality Measurement (SQM) report for the CLEC Aggregate (August 2001). KPMG Consulting found that BellSouth's instructions in the Raw Data User Manual (RDUM) are insufficient for calculating the metrics values for this SQM. This exception was originally issued as Observation 139.

#### Current issue:

KPMG Consulting is waiting for February 2002 data.

Exception

*152* 

Metrics

28-Feb-02

23-Apr-02

KPMG Consulting cannot replicate the values in the Provisioning: Local Number Portability (LNP) - Percent Missed Installation Appointments Service Quality Measurement (SQM) report for the CLEC Aggregate (May 2001). This exception was originally issued as Observation 125.

## Current issue:

KPMG Consulting is currently awaiting the BellSouth Response to the amended

Exception

*153* 

PMR5

PMR5

Metrics

28-Feb-02

03-May-02

Open

KPMG Consulting cannot replicate the values in the Provisioning: Local Number Portability (LNP) Total Service Order Cycle Time Service Quality Measurement (SQM) report for the CLEC Aggregate (May 2001). KPMG Consulting found that BellSouth's instructions in the Raw Data User Manual (RDUM) are insufficient for calculating the metrics values for this SQM. This exception was originally issued as Observation 113.

#### Current issue:

KPMG Consulting is currently awaiting a BellSouth Response to the amended

Exception

154

PMR5 Metrics 28-Feb-02

10-Apr-02

KPMG Consulting cannot replicate the values in the Provisioning: Coordinated Customer Conversions Interval Service Quality Measurement (SQM) report for the Competitive Local Exchange Carrier (CLEC) Aggregate (August 2001). This exception was originally issued as Observation 142.

## Current issue:

No further action is required.

Exception

155

PPR1

Relationship Management Infrastructure

28-Feb-02

11-Apr-02

BellSouth fails to provide the Business Rules and user requirements for Minor releases in accordance with the intervals defined in the Change Control Process. This exception was originally issued as Observation 154.

KPMG Consulting is currently retesting.

# Date of First Call Latest activity

Exception

156

Repair, Provisioning & Maintenance

28-Feb-02

24-Apr-02

Open

BellSouth failed to properly establish and test Line Class Codes (LCCs), which were requested by KPMG Consulting for Operator Services/Directory Assistance (OS/DA) services. This Exception was originally issued as Observation 152.

Current issue:

KPMG Consulting is planning a retest. Central Office visits are scheduled for the first two weeks in April.

TVV4

Exception

*157* 

PPR5

Relationship Management Infrastructure

14-Mar-02

29-Mar-02

BellSouth fails to follow its software testing and quality processes.

KPMG Consulting is currently reviewing the BellSouth Amended Response to this exception.

Exception

158

TVV4

Repair, Provisioning & Maintenance

14-Mar-02

20-Mar-02

Open

BellSouth's CLEC Line Loss Report does not update in a timely manner.

Current issue:

KPMG Consulting is currently reviewing the BellSouth Response to this exception.

Exception

159

TVV10 Billing

28-Mar-02

28-Mar-02

BellSouth failed to deliver at least 95% of Daily Usage File (DUF) records within six calendar days following the date the calls were placed.

Current issue:

KPMG Consulting is currently reviewing the BellSouth Response to this exception and will conduct a retest.

Exception Open

*160* 

TVV2

Order Management

25-Apr-02

25-Apr-02

KPMG Consulting has experienced system degradation while processing Local Service Requests (LSRs) via the Local Exchange Navigation System (LENS) interface.

KPMG Consulting is currently reviewing the BellSouth Response to this exception.

Date of First Call Latest activity

Exception

*161* 

TVV1 Order Management

24-Apr-02

03-May-02

Open

KPMG Consulting has not received timely Non-Mechanized rejects from BellSouth.

Current issue:

KPMG Consulting is currently reviewing the BellSouth Response to this exception.

Exception

*162* 

TVV1

Order Management

01-May-02

01-May-02

Open

BellSouth ordering documents do not provide adequate instructions for submitting orders for Centrex® service.

<u>Current issue:</u>
KPMG Consulting is currently awaiting the BellSouth Response to this exception.